

LOWELL DECL. EX. 50

In the U.S. District Court
District of Columbia

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:
Shabtai Scott Shatsky, et :
al :
:
v. :NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
-----X

February 6, 2013

DEPOSITION OF:

Leor Thaler,

a witness, called by counsel pursuant to notice,
commencing at 9:07 a.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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1 (Whereupon the matter commenced at
2 9:07 a.m.)
3 Stipulations
4 (It is stipulated and agreed by and
5 between counsel for the respective parties that
6 the reading and signing of this transcript by the
7 witness are not waived.
8 It is further stipulated and agreed
9 that the filing of this transcript with the clerk
10 of the court be and the same is hereby waived.)
11 * * * * *
12
13 Whereupon,
14 Leor Thaler
15
16 was called for examination by counsel and,
17 after having been duly sworn, was examined
18 and testified as follows:
19 DIRECT EXAMINATION:
20 BY MR. HILL:
21 Q. Please tell me your full name.

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1 **A. Leor Thaler.**

2 Q. Do you have any middle names?

3 **A. Phillip.**

4 Q. Have you ever been known by any other
5 names?

6 **A. No.**

7 Q. What's your date of birth?

8 **A. 12th of July 1987.**

9 Q. Mr. Thaler, I know you've been deposed
10 before but let's go over the ground rules so you
11 understand what will happen here today.

12 I'll ask questions. You'll give answers.

13 Everything that's said will be taken down by the
14 court reporter, Mr. Feuer.

15 During the course of the day I may ask a
16 question that you don't understand. If that happens
17 please let me know and I'll try and rephrase it so
18 you can understand it.

19 **A. Okay.**

20 Q. During the course of the day Mr. Steiner
21 may make an objection. If that happens please wait

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1 until he finishes speaking and then unless he tells
2 you not to answer the question, please go ahead and
3 answer the question.

4 **A. Okay.**

5 Q. During the course of the day I will
6 probably ask a question and you know what the
7 question is and you know what the answer is and
8 there will be a temptation to interrupt me and go
9 ahead and give the answer.

10 Try and resist doing that because it makes
11 it hard for Mr. Feuer to take things down if we're
12 both talking at the same time.

13 Is there any reason you won't be able to
14 give full and truthful testimony here today?

15 **A. No.**

16 Q. Are you taking any medication that would
17 impair your ability to understand me or tell the
18 truth?

19 **A. No.**

20 Q. Are you, in fact, taking any medication
21 today?

1 **A. Yes.**

2 Q. Would you tell me what medications you are
3 currently on?

4 **A. Abilify, Lemictal.**

5 Q. What does Abilify treat you for?

6 **A. I don't know exactly. It's -- I don't
7 remember what exactly the purpose of it is.**

8 Q. Is this an antipsychotic drug?

9 **A. I think it is.**

10 Q. Was it prescribed for you by a
11 psychiatrist?

12 **A. Yes.**

13 Q. How long have you been taking that
14 medication?

15 **A. For a year.**

16 Q. You are on Lemictal?

17 **A. Yes.**

18 Q. What condition does that treat?

19 **A. I don't know how to say it in English.
20 It's a mood stabilizer.**

21 Q. Was that also prescribed for you by your

1 psychiatrist?

2 **A. Yes.**

3 Q. How long have you been taking that
4 medication?

5 **A. For a year and a half.**

6 Q. Have you continuously been on those
7 medications for those periods of time?

8 **A. I switched a few different times
9 medication but now this is the medication I'm
10 taking.**

11 Q. Do you believe that these medications have
12 helped to prevent you from having psychotic
13 episodes?

14 MR. STEINER: Objection, there's no
15 testimony he has had psychotic episodes. That's
16 your characterization.

17 BY MR. HILL:

18 Q. Answer, please.

19 **A. I never been in a psychotic condition so I
20 wouldn't say that.**

21 Q. Do you believe that taking these

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1 medications has helped stabilize your moods?

2 **A. Yes.**

3 Q. If at any point during the course of the
4 day you need a break, let me know and we'll be happy
5 to do that.

6 **A. Yes.**

7 MR. HILL: Mr. Steiner, I know the
8 witness speaks English.

9 Since there's not a videotape here I'd
10 ask that you address the witness in English.
11 Otherwise we're not going to have a record of what
12 you are saying.

13 MR. STEINER: I said for a cigarette,
14 bathroom, or whatever, ask for a recess.

15 THE WITNESS: Some words I have a
16 problem with, I won't be able to say in English.

17 BY MR. HILL:

18 Q. Let's do it this way.

19 Since we don't have a certified translator
20 here today, since we don't have a videotape I'm
21 going to ask Mr. Steiner to only speak English to

1 Q. How long did you live in Brooklyn?

2 **A. Four years.**

3 Q. Where did you move after you left
4 Brooklyn?

5 **A. Baltimore.**

6 Q. How long did you reside in Baltimore?

7 **A. Five years.**

8 Q. Where did you move after Baltimore?

9 **A. Moved to Ginot Shomron.**

10 Q. Then you lived in Ginot Shomron until you
11 moved as you described earlier today, correct?

12 **A. Yes.**

13 Q. Do you have an American social security
14 number?

15 **A. Yes.**

16 Q. What is it?

17 **A. I don't know.**

18 Q. Have you ever paid any taxes to the
19 American government?

20 **A. No.**

21 Q. What are the names of your parents?

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1 you and if there is a need for a word that you don't
2 understand, tell me and we'll try and come up with
3 another word.

4 **A. All right.**

5 Q. What is your current address?

6 **A. Heesin 6, apartment 15, Petach Tikva.**

7 Q. How long have you lived at that apartment?

8 **A. 18 months.**

9 Q. What was your address prior to that?

10 **A. Before that? Bait Habad 6 in Hod**
11 **HaSharon.**

12 Q. Where did you live before that?

13 **A. Before that I lived in a different place**
14 **in Hod HaSharon.**

15 Q. How about before that?

16 **A. Ginot Shomron.**

17 Q. When you lived in Ginot Shomron was that
18 the time you were living with your mother?

19 **A. Yes.**

20 Q. Where were you born?

21 **A. Brooklyn.**

1 **A. Ginette and Michael.**

2 Q. The last name is?

3 **A. Thaler.**

4 Q. Do you have any siblings?

5 **A. Yes.**

6 Q. How many?

7 **A. I have a half brother, Yitzhak Zvi, and my**
8 **sister that was killed, Rachel.**

9 Q. Have you ever been married?

10 **A. No.**

11 Q. Do you have any children?

12 **A. No.**

13 Q. Of what country or countries are you a
14 citizen?

15 **A. England, America, and Israel.**

16 Q. What languages other than English do you
17 speak?

18 **A. Hebrew.**

19 Q. Are you currently employed?

20 **A. No.**

21 Q. I'd like to go over your educational

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1 background. Where did you go to high school?
 2 **A. I went to Bnei Chayil it's called.**
 3 Q. Where is that school located?
 4 **A. In Kedumim.**
 5 Q. Did you take a bus to go to your school?
 6 **A. Yes.**
 7 Q. Was the school that you attended located
 8 across the Green Line, as they say?
 9 MR. STEINER: Objection.
 10 **A. Yes.**
 11 Q. Can you describe the sort of bus that you
 12 had to travel on?
 13 **A. It's a bus that was against bullets,**
 14 **against -- against bullets.**
 15 Q. This was an armored bus that you went to
 16 school on?
 17 **A. Yes.**
 18 Q. While you were traveling on the bus did
 19 anyone ever attack the bus?
 20 **A. No.**
 21 Q. Do you know why you went to school in a

1 Q. Did you ever attend a boarding school?
 2 **A. Yes.**
 3 Q. Which one was that?
 4 **A. Beit Hagai.**
 5 Q. When did you attend that school?
 6 **A. Eighth grade.**
 7 Q. Where is that school located?
 8 **A. Next to Kiryat Shmona.**
 9 Q. While you were at the boarding school you
 10 lived at the school during the school term?
 11 **A. Yes.**
 12 Q. Why did you go to the boarding school?
 13 **A. I don't know exactly. From where I lived,**
 14 **they sent me there.**
 15 Q. Was it because of behavioral problems at
 16 school?
 17 **A. Yes.**
 18 Q. What was the nature of the problems that
 19 led to you being sent to boarding school?
 20 **A. I don't really remember.**
 21 Q. How old were you when you went to the

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1 bulletproof bus?
 2 **A. No.**
 3 Q. How long were you taking the bulletproof
 4 bus to school?
 5 **A. As long as I lived there.**
 6 Q. As long as you lived in Ginot Shomron you
 7 were taking a bulletproof bus to school on school
 8 days?
 9 **A. Yes.**
 10 Q. You went to that high school. Where did
 11 you attend prior to attending the high school, what
 12 school did you attend prior to the high school?
 13 **A. I forgot what it's called but it's in**
 14 **Karnei Shomron.**
 15 Q. While you were going to school in Karnei
 16 Shomron you were not taking the bulletproof bus?
 17 **A. No.**
 18 Q. Prior to the school in Karnei Shomron did
 19 you attend any other schools?
 20 **A. Yes. It was a different school also in**
 21 **Karnei Shomron from the third grade.**

1 boarding school?
 2 **A. Twelve.**
 3 Q. This was prior to the attack on
 4 February 16, 2002?
 5 **A. Yes.**
 6 Q. You attended the boarding school for one
 7 year?
 8 **A. I don't know. I didn't finish the school**
 9 **year.**
 10 Q. Were you expelled from that school?
 11 **A. No.**
 12 Q. Why did you --
 13 **A. I ran away from there.**
 14 Q. Where did you run to?
 15 **A. Back to my -- Bnei Chayil.**
 16 Q. Your parents allowed you to move back into
 17 the home at that point?
 18 **A. Yes.**
 19 Q. Why did you run away from the school?
 20 **A. Didn't like it.**
 21 Q. Did you graduate from high school?

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1 **A. No.**
 2 Q. Have you done any studies to complete your
 3 high school diploma?
 4 **A. Started to.**
 5 Q. You are currently working on that?
 6 **A. Yes.**
 7 Q. When do you expect to complete the
 8 requirements to graduate from high school?
 9 **A. A year and a half, two years.**
 10 Q. Is there a program that you are enrolled
 11 in to do that?
 12 **A. No.**
 13 Q. You just are doing the requirements on
 14 your own?
 15 **A. At the school.**
 16 Q. What's the school that you are currently
 17 working toward the diploma at?
 18 **A. Tichon Tel Aviv.**
 19 Q. Is that located in Tel Aviv?
 20 **A. No, in Kfar Saba.**
 21 Q. Have you had any other education since

1 Q. What kind of work were you doing there?
 2 **A. Taking sandbags from one place to the**
 3 **other, a black job.**
 4 Q. Do you recall approximately how much you
 5 were being paid for that work?
 6 **A. I have no idea.**
 7 Q. You mentioned that you worked for a
 8 catering company?
 9 **A. Yes.**
 10 Q. Did you work for more than one company?
 11 **A. Yes.**
 12 Q. Can you tell me the names of the companies
 13 that you worked for in the catering business?
 14 **A. Chay Grill and Meetamay Rachel.**
 15 Q. What city or cities did you work for those
 16 two organizations?
 17 **A. We were traveling around almost every**
 18 **city, the Chay Grill, and Meetamay Rachel in Petach**
 19 **Tikva.**
 20 Q. Do you recall approximately how much you
 21 were being paid for that catering work?

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1 high school apart from what you are currently doing?
 2 **A. No.**
 3 Q. When did you leave high school?
 4 **A. I left probably eleventh grade. I started**
 5 **working.**
 6 Q. Why did you leave high school in the
 7 eleventh grade?
 8 **A. To work.**
 9 Q. Since you left high school in the eleventh
 10 grade can you tell me where you have worked?
 11 **A. The first job I worked in a building site,**
 12 **builders. Then I started working with a catering**
 13 **place and from there I did a bartender course, I**
 14 **started working as a bartender. Then I worked in**
 15 **the States. Then I worked as a bartender until not**
 16 **long ago.**
 17 Q. You mentioned that you worked at a
 18 building site. In what city were you working on the
 19 building site?
 20 **A. It was -- it's a building site with a**
 21 **building constructor. I think in Emanuel.**

1 **A. 20, 25.**
 2 Q. Shekels per hour, is that what you are
 3 saying?
 4 **A. Yes.**
 5 Q. You mentioned that you had taken a
 6 bartender course?
 7 **A. Yes.**
 8 Q. At what organization did you take the
 9 course?
 10 **A. Bartender.**
 11 Q. Where is the bartender organization
 12 located?
 13 **A. It used to be in Tel Aviv. Now they are**
 14 **closed.**
 15 Q. You worked as a bartender?
 16 **A. Yes.**
 17 Q. How many places did you work as a
 18 bartender at?
 19 **A. Maybe 30.**
 20 Q. In what city or cities were you tending
 21 bar?

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1 **A. Eilat, Jerusalem, Petach Tikva, Hod**

2 **HaSharon, Kfar Saba.**

3 Q. Why the you move around so much?

4 **A. I just did.**

5 Q. You mentioned that you had done some work
6 in the United States.

7 **A. Yes.**

8 Q. In what city or cities did you work in the
9 United States?

10 **A. I worked in Florida.**

11 Q. What are the dates that you were working
12 in Florida?

13 **A. I have no idea.**

14 Q. What was the year?

15 **A. I think 2005, 6.**

16 Q. How old would you have been?

17 **A. 18.**

18 Q. Did you work for more than one
19 organization in the United States?

20 **A. Yes.**

21 Q. Which organizations did you work for in

1 arrangement?

2 **A. Yes.**

3 Q. Do you remember which town in Colorado you
4 worked in?

5 **A. Next to the Rocky Mountains.**

6 Q. Then you said you went to Las Vegas?

7 **A. Yes.**

8 Q. Were you doing the same thing, working at
9 a mall?

10 **A. Yes.**

11 Q. How long did you live in Melbourne,
12 Florida while you were working there?

13 **A. Two months.**

14 Q. How many in Jacksonville?

15 **A. Like three months.**

16 Q. How long did you live in Colorado?

17 **A. Three months.**

18 Q. How long did you live in Las Vegas?

19 **A. A month.**

20 Q. Did you have these jobs in the
21 United States and Florida, Colorado and Las Vegas,

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1 the United States?

2 **A. I don't remember the names.**

3 Q. What were you doing?

4 **A. Selling Dead Sea products.**

5 Q. Where would you sell these products?

6 **A. In the malls.**

7 Q. You were working in one of the kiosks in
8 the malls selling the salts and that sort of thing?

9 **A. Yes.**

10 Q. What city in Florida were you working in?

11 **A. Melbourne.**

12 Q. Did you work in any other cities in the
13 United States other than Melbourne, Florida?

14 **A. Yes.**

15 Q. Where else?

16 **A. Jacksonville, Florida, Colorado, I don't
17 remember where, and Vegas.**

18 Q. When you worked in Jacksonville were you
19 also working at the mall?

20 **A. Yes.**

21 Q. Working in Colorado, was that the same

1 was that one trip where you went to all three of
2 these states?

3 **A. Three trips.**

4 Q. On your first trip you worked in Florida?

5 **A. Yes.**

6 Q. Then you moved back to Israel for a while?

7 **A. Yes.**

8 Q. Then you came and worked in Colorado for a
9 while?

10 **A. I came back to Florida, moved to Colorado,
11 yes.**

12 Q. After Colorado did you go back to Israel?

13 **A. Yes.**

14 Q. Then you came back for a third time now
15 and worked in Las Vegas?

16 **A. Yes.**

17 Q. Then you moved back to Israel from there?

18 **A. Yes.**

19 Q. This was all when you were about 18 or 19
20 years old?

21 **A. Between 18 to 21.**

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1 Q. What were you doing in Israel in between
2 these stints doing the selling of the Dead Sea
3 products in the U.S.?

4 **A. Bartending.**

5 Q. You said you had been bartending recently,
6 right?

7 **A. Until seven months ago.**

8 Q. Since that last bartending job ended have
9 you been unemployed?

10 **A. No.**

11 Q. What have you been doing in the last seven
12 months?

13 **A. Working as a driver.**

14 Q. What kind of a driver?

15 **A. In a rental company.**

16 Q. Can you describe what your job is like?

17 **A. Drive cars to garages.**

18 Q. What's the name of the rental company?

19 **A. Shlomo 6th.**

20 Q. Where it located?

21 **A. Petach Tikva.**

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1 Q. Are you still employed by Shlomo 6th?

2 **A. No.**

3 Q. When did that job end?

4 **A. When I came here, Thursday.**

5 Q. Are you expecting to go back to work when
6 you go back?

7 **A. Maybe.**

8 Q. While you were doing the sales in the

9 United States at the malls were you working for the
10 same company?

11 **A. No.**

12 Q. A whole series of companies?

13 **A. Yes.**

14 Q. Have you ever worked for any of your
15 family members?

16 **A. For my brother.**

17 Q. That's Isaac?

18 **A. Yes.**

19 Q. What work did you do for Isaac?

20 **A. I worked in a warehouse.**

21 Q. What kind of work did you do?

1 **A. Packaging and shipping.**

2 Q. What kind of business was the company in?

3 **A. Printing business he had.**

4 Q. Why did you stop working for Isaac at the
5 printing business?

6 **A. Because I went back to Israel.**

7 Q. Have you ever been fired from a job?

8 **A. Yes.**

9 Q. Approximately on how many occasions?

10 **A. Three times.**

11 Q. When was the first time?

12 **A. Two or three years ago.**

13 Q. Which job was that?

14 **A. As a bartender.**

15 Q. Do you remember where you were fired from,
16 what the name of it was?

17 **A. The name, no, but it was on the beach.**

18 Q. Which beach?

19 **A. In Herzliya.**

20 Q. Why were you fired?

21 **A. Because I came late to work every time.**

1 Q. Why were you coming late to work?

2 **A. Because I lived far away.**

3 Q. What was the second time you recollect
4 being fired?

5 **A. The second time also as a bartender. I
6 don't remember the reason.**

7 Q. Where was that bar?

8 **A. I don't remember.**

9 Q. Do you remember anything about it?

10 **A. I switched --**

11 MR. STEINER: Okay.

12 BY MR. HILL:

13 Q. You just remember being fired from working
14 at a bar but you can't remember where it was or why
15 it was?

16 **A. Yes.**

17 Q. What was the first occasion that you
18 recall being terminated from a job?

19 **A. I don't understand the question.**

20 Q. You mentioned that you thought you had
21 been fired three times, is that right?

	Page 30		Page 32
1	A. Yes.	1	MR. STEINER: Objection.
2	Q. You told me about two. What's the other	2	THE WITNESS: Yes.
3	occasion when you were fired?	3	BY MR. HILL:
4	A. The third one, from a coffee shop.	4	Q. What were they asking you?
5	Q. Where was that coffee shop located?	5	MR. STEINER: Objection.
6	A. In Hod HaSharon.	6	THE WITNESS: When I use drugs.
7	Q. Do you remember the name of it?	7	BY MR. HILL:
8	A. Lola and Kupa.	8	Q. Did you have to go to court?
9	Q. Why were you fired from Lola and Kupa?	9	MR. STEINER: Objection.
10	A. The same thing, not coming on time.	10	THE WITNESS: Once.
11	Q. Have you ever gotten in a fight with	11	BY MR. HILL:
12	anyone at work?	12	Q. Do you remember what court you went to?
13	MR. STEINER: Objection.	13	MR. STEINER: Objection.
14	THE WITNESS: At work, no.	14	THE WITNESS: Kfar Saba.
15	BY MR. HILL:	15	BY MR. HILL:
16	Q. What are you thinking of?	16	Q. Was this in connection with the arrest in
17	A. I've been in fights.	17	Ariel?
18	Q. Have you ever been arrested?	18	MR. STEINER: Objection.
19	A. Yes.	19	THE WITNESS: Yes.
20	Q. On how many occasions?	20	BY MR. HILL:
21	MR. STEINER: Objection.	21	Q. When you went to court in Kfar Saba, what
	Page 31		Page 33
1	THE WITNESS: Three times.	1	happened?
2	BY MR. HILL:	2	MR. STEINER: Objection.
3	Q. When is the first time you can recall	3	THE WITNESS: They send me to do drug
4	being arrested?	4	test and closed the file after a year.
5	A. When I was 17.	5	BY MR. HILL:
6	Q. Who were you arrested by?	6	Q. Did you, in fact, do drug testing over the
7	A. Police.	7	course of the year following that appearance in Kfar
8	Q. Israeli police?	8	Saba?
9	A. Yes.	9	MR. STEINER: Objection.
10	Q. In what city?	10	THE WITNESS: Yes.
11	MR. STEINER: Excuse me. Standing	11	BY MR. HILL:
12	objection to all questions related to an arrest.	12	Q. Were your drug tests positive or negative?
13	BY MR. HILL:	13	MR. STEINER: Objection.
14	Q. In what city were you arrested by the	14	THE WITNESS: Clean.
15	Israeli police?	15	BY MR. HILL:
16	A. City of Ariel.	16	Q. Had you, in fact, stopped using drugs for
17	Q. Were you taken to jail?	17	that year?
18	A. No.	18	MR. STEINER: Objection.
19	MR. STEINER: Objection.	19	THE WITNESS: Yes.
20	BY MR. HILL:	20	BY MR. HILL:
21	Q. Were you interviewed by the police?	21	Q. What was the next occasion on which you

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<p>1 were arrested?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: That was it. That was</p> <p>4 the last time.</p> <p>5 BY MR. HILL:</p> <p>6 Q. Prior to the arrest in Ariel you had been</p> <p>7 arrested on two other occasions, right?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: It was the police, I</p> <p>10 was arrested in Ginot Shomron, three times.</p> <p>11 BY MR. HILL:</p> <p>12 Q. How old were you the first time you were</p> <p>13 arrested in Ginot Shomron?</p> <p>14 MR. STEINER: Objection.</p> <p>15 THE WITNESS: 17, 16.</p> <p>16 BY MR. HILL:</p> <p>17 Q. Were you taken to the police station?</p> <p>18 MR. STEINER: Objection.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MR. HILL:</p> <p>21 Q. Were you interviewed by the police?</p>	<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. HILL:</p> <p>4 Q. Then you were arrested again?</p> <p>5 A. Yes.</p> <p>6 Q. Approximately how old were you the second</p> <p>7 arrest?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: 17.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Were you interviewed by the police on that</p> <p>12 occasion?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Did you go to the police station?</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MR. HILL:</p> <p>20 Q. What were they asking you about on the</p> <p>21 second arrest?</p>
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<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. HILL:</p> <p>4 Q. What did they ask you about?</p> <p>5 MR. STEINER: Objection.</p> <p>6 THE WITNESS: Questions.</p> <p>7 BY MR. HILL:</p> <p>8 Q. What were they asking you about?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: If I use drugs.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Anything else?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: Who sells me the drugs.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Anything else?</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: I don't remember.</p> <p>19 BY MR. HILL:</p> <p>20 Q. That was the first time you were arrested</p> <p>21 in Ginot Shomron?</p>	<p>1 A. The same thing.</p> <p>2 Q. How about the third arrest in Ginot</p> <p>3 Shomron?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: What do you want to</p> <p>6 know?</p> <p>7 BY MR. HILL:</p> <p>8 Q. How old were you at the time?</p> <p>9 A. 18.</p> <p>10 MR. STEINER: Objection.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Why were you arrested?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: Drugs.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Did you go to the police station?</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Did the police interview you?</p> <p>21 MR. STEINER: Objection.</p>

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<p>1 THE WITNESS: Yes.</p> <p>2 BY MR. HILL:</p> <p>3 Q. What did they ask you about?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: Drugs.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Did any of these arrests in Ginot Shomron</p> <p>8 require you to go to court?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: The third one.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Is that a different court appearance than</p> <p>13 the one you described for me earlier this morning?</p> <p>14 MR. STEINER: Objection.</p> <p>15 THE WITNESS: The other ones I wasn't</p> <p>16 in court.</p> <p>17 BY MR. HILL:</p> <p>18 Q. You mentioned that you had been to court</p> <p>19 in Kfar Saba?</p> <p>20 A. Yes.</p> <p>21 Q. Was that the third arrest in Ginot Shomron</p>	<p>1 Q. On the three occasions you were arrested</p> <p>2 all of the arrests took place in Ginot, correct?</p> <p>3 A. Correct.</p> <p>4 MR. STEINER: Objection. I'm not</p> <p>5 removing the objections I made to that testimony.</p> <p>6 That testimony was given under objection.</p> <p>7 MR. HILL: Your objection is on</p> <p>8 record.</p> <p>9 BY MR. HILL:</p> <p>10 Q. When did you first start using drugs?</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: When I was 17,</p> <p>13 probably.</p> <p>14 BY MR. HILL:</p> <p>15 Q. What kind of drugs did you first start</p> <p>16 using when you were 17?</p> <p>17 A. Marijuana and hash.</p> <p>18 Q. Have you used any other illegal drugs</p> <p>19 other than marijuana or hash?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: Yes.</p>
Page 39	Page 41
<p>1 that we talked about?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. HILL:</p> <p>5 Q. I want to go back to the arrest in Ariel.</p> <p>6 On that occasion you were interviewed --</p> <p>7 MR. STEINER: Objection. The</p> <p>8 testimony is there were no arrests in Ariel but it</p> <p>9 was Ariel police officers making an arrest in</p> <p>10 another town.</p> <p>11 That's what the testimony was.</p> <p>12 MR. HILL: I'm not sure I heard that.</p> <p>13 BY MR. HILL:</p> <p>14 Q. Were you arrested in the city of Ariel?</p> <p>15 A. No.</p> <p>16 Q. But you were arrested by the Ariel police?</p> <p>17 A. Yes.</p> <p>18 Q. Where did that arrest take place?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: In Ginot.</p> <p>21 BY MR. HILL:</p>	<p>1 BY MR. HILL:</p> <p>2 Q. Please tell me the names of the other</p> <p>3 illegal drugs you've used?</p> <p>4 MR. STEINER: Standing objection to</p> <p>5 all illegal drug use.</p> <p>6 THE WITNESS: LSD, mushrooms,</p> <p>7 ecstasy, MDMA, and acid.</p> <p>8 BY MR. HILL:</p> <p>9 Q. On how many occasions do you believe that</p> <p>10 you've used marijuana?</p> <p>11 A. Many times.</p> <p>12 Q. Hundreds of occasions do you think?</p> <p>13 A. Yes.</p> <p>14 Q. On how many occasions do you believe</p> <p>15 you've used hash?</p> <p>16 A. Many.</p> <p>17 Q. Also hundreds of occasions?</p> <p>18 A. Yes.</p> <p>19 Q. On how many occasions do you believe</p> <p>20 you've used LSD?</p> <p>21 A. Three times.</p>

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1 Q. On how many occasions do you believe
2 you've used mushrooms?

3 **A. One time.**

4 Q. On how many occasions do you believe
5 you've used ecstasy?

6 **A. Once.**

7 Q. On how many occasions do you believe
8 you've used MDMA?

9 **A. Ten times.**

10 Q. On approximately how many occasions do you
11 believe you've used acid?

12 **A. Two times.**

13 Q. When was the last time that you used
14 illegal drugs?

15 MR. STEINER: Objection.

16 THE WITNESS: Can I talk to my
17 lawyer?

18 MR. HILL: If it's a question of
19 privilege you can take a break.

20 MR. STEINER: Your question, on what
21 occasion did you use illegal drugs, the drug use was

1 **A. Five times.**

2 Q. Is that a typical pattern for you within
3 the last six months?

4 **A. Yes and no.**

5 Q. Explain what you mean.

6 **A. I didn't smoke for a while. I smoked here
7 and there.**

8 Q. How long have you been smoking
9 approximately five times a week?

10 **A. For a month and a half.**

11 Q. In the last month and a half have you used
12 any illegal drugs other than marijuana?

13 **A. No.**

14 MR. STEINER: Objection.

15 BY MR. HILL:

16 Q. When was the last time you used hash?

17 **A. Sunday also.**

18 Q. Are you typically using hash and marijuana
19 at the same time?

20 **A. Yes.**

21 Q. When was the last time you used LSD?

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1 taking place in a different country. I don't know
2 if you are familiar with the rules regulating drug
3 use in other countries. I think you might be better
4 off not --

5 MR. HILL: Well, he would like to
6 talk to you so why don't you take a break?

7 (Whereupon, a recess was taken from
8 9:36 a.m. to 9:38 a.m.)

9 MR. STEINER: Thank you.

10 BY MR. HILL:

11 Q. Mr. Thaler, when did you last use illegal
12 drugs?

13 **A. On Sunday.**

14 Q. What drugs did you use?

15 **A. Marijuana.**

16 Q. Prior to your use of marijuana on Sunday,
17 when was the last occasion that you used illegal
18 drugs?

19 **A. The day before.**

20 Q. On how many occasions do you believe you
21 smoked marijuana last week?

1 **A. Five months.**

2 Q. Five months ago?

3 **A. Yes.**

4 Q. You mentioned you've used it on
5 approximately three occasions. One was five months
6 ago. When do you think the prior use was?

7 **A. Twice two and a half years ago.**

8 Q. You mentioned that you used mushrooms on
9 one occasion. Approximately when was that?

10 **A. When I was 21.**

11 Q. You mentioned that you used ecstasy on one
12 occasion. Approximately when was that?

13 **A. Half a year ago.**

14 Q. Then you said you believed you had used
15 MDMA on about ten occasions. When was the last time
16 you used MDMA?

17 **A. Last January.**

18 Q. Do you remember approximately when you
19 used it on the prior nine occasions?

20 **A. What?**

21 Q. You believe you last used MDMA last

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<p>1 January.</p> <p>2 A. Yes.</p> <p>3 Q. Prior to that when do you recall using it?</p> <p>4 A. Here and there.</p> <p>5 Q. Was there a period of time where you were</p> <p>6 using it regularly?</p> <p>7 A. No.</p> <p>8 Q. Occasionally you would take it?</p> <p>9 A. Yes.</p> <p>10 Q. You mentioned that you used acid on two</p> <p>11 occasions.</p> <p>12 A. Yes.</p> <p>13 Q. When was the first time you used acid?</p> <p>14 A. A year and a half ago.</p> <p>15 Q. When was the second occasion?</p> <p>16 A. A few months ago.</p> <p>17 Q. Sir, have you now told me about all of the</p> <p>18 illegal drug use that you can recall?</p> <p>19 A. Yes.</p> <p>20 Q. Have you had any treatment for drug usage?</p> <p>21 A. I was in rehab.</p>	<p>1 A. All kinds. I don't know how to explain it</p> <p>2 in English.</p> <p>3 Q. Did you have like group therapy sessions?</p> <p>4 A. Yes.</p> <p>5 Q. Did you have meetings with a psychologist</p> <p>6 or psychiatrist?</p> <p>7 A. No.</p> <p>8 Q. Did you complete that program?</p> <p>9 A. Yes.</p> <p>10 Q. Were you clean for a period of time after</p> <p>11 you left the program?</p> <p>12 A. Yes.</p> <p>13 Q. Approximately how long were you clean?</p> <p>14 A. Three months.</p> <p>15 Q. You understand what I mean when I say</p> <p>16 "clean," right?</p> <p>17 A. Yes.</p> <p>18 Q. Not taking drugs, right?</p> <p>19 A. Yes.</p> <p>20 Q. After about three months you started</p> <p>21 taking drugs again?</p>
Page 47	Page 49
<p>1 Q. When were you in rehab?</p> <p>2 A. In July.</p> <p>3 Q. Of which year?</p> <p>4 A. What?</p> <p>5 Q. Of which year?</p> <p>6 A. This year.</p> <p>7 Q. July of 2012?</p> <p>8 A. 2012.</p> <p>9 Q. Which rehab facility were you in? Where</p> <p>10 did you go for rehab?</p> <p>11 A. In Beer Sheva.</p> <p>12 Q. Do you remember the name of the place?</p> <p>13 A. The Institute for the Health of the Soul.</p> <p>14 Q. In what city is that institute located?</p> <p>15 A. Beer Sheva.</p> <p>16 Q. How long were you there?</p> <p>17 A. For one month.</p> <p>18 Q. What did your treatment in rehab consist</p> <p>19 of?</p> <p>20 A. Twelve steps, lessons.</p> <p>21 Q. Anything else?</p>	<p>1 A. Yes.</p> <p>2 Q. Do you have any current plans for further</p> <p>3 drug treatment?</p> <p>4 A. No.</p> <p>5 Q. You mentioned earlier that you had been in</p> <p>6 many fights?</p> <p>7 MR. STEINER: Objection.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Did any of those fights ever result in the</p> <p>10 police being called?</p> <p>11 A. I never said many fights. And no.</p> <p>12 Q. How many occasions do you believe you've</p> <p>13 been in a fight, sir?</p> <p>14 A. Five, ten.</p> <p>15 Q. Have any of these fights that you've been</p> <p>16 in on these five to ten occasions ever resulted in</p> <p>17 someone going to a hospital?</p> <p>18 A. Once.</p> <p>19 Q. Who went to the hospital?</p> <p>20 A. The other guy.</p> <p>21 MR. STEINER: Objection.</p>

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<p>1 BY MR. HILL:</p> <p>2 Q. What was the nature of his injury?</p> <p>3 A. His eye was opened.</p> <p>4 MR. STEINER: Objection.</p> <p>5 BY MR. HILL:</p> <p>6 Q. His eye was opened because you had struck</p> <p>7 him?</p> <p>8 A. Yes.</p> <p>9 MR. STEINER: Objection.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Where did that altercation take place?</p> <p>12 MR. STEINER: Objection.</p> <p>13 THE WITNESS: At school.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Which school?</p> <p>16 A. Bnei Chayil.</p> <p>17 MR. STEINER: Objection.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Did you receive any discipline at the</p> <p>20 school because of this fight?</p> <p>21 A. Yes.</p>	<p>1 for injuries you sustained in a fight, correct?</p> <p>2 A. Yes.</p> <p>3 Q. When did you first see a psychologist or</p> <p>4 psychiatrist that you can recall, sir?</p> <p>5 A. I remember twelve.</p> <p>6 Q. Do you remember the name of the person you</p> <p>7 saw when you were twelve years old?</p> <p>8 A. No.</p> <p>9 Q. Do you remember what organization they</p> <p>10 were with?</p> <p>11 A. In Shalvata.</p> <p>12 Q. Do you remember why you went to see that</p> <p>13 person?</p> <p>14 A. No.</p> <p>15 Q. Did you receive any testing or evaluation?</p> <p>16 A. I don't remember.</p> <p>17 Q. Did you receive any diagnoses as a result</p> <p>18 of those visits?</p> <p>19 A. I don't remember.</p> <p>20 Q. How frequently were you going to see this</p> <p>21 person in Shalvata?</p>
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<p>1 Q. What discipline did you receive as a</p> <p>2 result?</p> <p>3 A. I don't remember.</p> <p>4 Q. Approximately how old were you on this</p> <p>5 occasion?</p> <p>6 A. 17.</p> <p>7 Q. Did that fight have anything to do with</p> <p>8 your decision to stop attending high school?</p> <p>9 A. No.</p> <p>10 Q. Any other occasions where you've been in a</p> <p>11 fight that someone has had to go to the hospital?</p> <p>12 A. No.</p> <p>13 Q. You've never had to be hospitalized or be</p> <p>14 treated because of injuries you received in a fight,</p> <p>15 is that correct?</p> <p>16 MR. STEINER: Objection.</p> <p>17 THE WITNESS: No.</p> <p>18 BY MR. HILL:</p> <p>19 Q. You are agreeing with me?</p> <p>20 A. What?</p> <p>21 Q. You've never had to have medical treatment</p>	<p>1 A. Once a week.</p> <p>2 Q. How often were you doing those visits?</p> <p>3 A. I don't remember.</p> <p>4 Q. Was it more than a month?</p> <p>5 A. I believe so.</p> <p>6 Q. Did this relate to behavioral problems?</p> <p>7 A. Yes.</p> <p>8 Q. What was the nature of the behavioral</p> <p>9 problems that led to the counseling?</p> <p>10 A. I lost control.</p> <p>11 Q. What do you mean when you say you lost</p> <p>12 control?</p> <p>13 A. I was throwing stuff in the house.</p> <p>14 Q. What kind of stuff?</p> <p>15 A. I don't remember.</p> <p>16 Q. Go ahead.</p> <p>17 A. Tiles.</p> <p>18 Q. What kind of tiles?</p> <p>19 A. From the roof.</p> <p>20 Q. You were on the roof of the house and you</p> <p>21 were throwing the tiles off the house?</p>

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1 **A. Yes.**

2 Q. That's what provoked going to see the
3 psychologist or psychiatrist?

4 **A. Yes.**

5 Q. Did going to see the psychologist or
6 psychiatrist help?

7 MR. STEINER: Objection.

8 THE WITNESS: No.

9 BY MR. HILL:

10 Q. Why were you up on the roof throwing
11 tiles?

12 MR. STEINER: Objection.

13 THE WITNESS: I don't remember.

14 BY MR. HILL:

15 Q. Was this about the time that your parents
16 were getting divorced?

17 **A. Yes.**

18 Q. Did the episode with throwing the tiles
19 have something to do with the divorce?

20 **A. I believe so.**

21 Q. How did you feel about your parents

1 **A. It has nothing to do with this. With my
2 own feelings, that's why.**

3 MR. HILL: Maybe we should take a
4 break and you could talk with him about it. I think
5 given the nature of the injuries claimed, the prior
6 psychological history is relevant.

7 We'll take a break.

8 (Whereupon, a recess was taken from
9 9:49 a.m. to 9:50 a.m.)

10 BY MR. HILL:

11 Q. Sir, why did you choose not to speak to
12 your father for those twelve years?

13 **A. I was angry at him that he left.**

14 Q. Did you at some point begin speaking to
15 your father again?

16 **A. Probably about a year ago.**

17 Q. Why did you decide to start speaking to
18 him again?

19 **A. It's about time to start talking with him.**

20 Q. Do you believe that the reason your
21 parents -- do you believe that it was your father's

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1 getting divorced?

2 **A. I don't really remember those days.**

3 Q. After your parents were divorced did you
4 continue to have contact with your father?

5 **A. For a short while.**

6 Q. Approximately how long?

7 **A. A year.**

8 Q. Then after a year you stopped having
9 contact with your father for a period?

10 **A. Yes.**

11 Q. How long was the period of time when you
12 were out of contact with your father?

13 **A. Twelve years.**

14 Q. Was that your decision to not be in
15 communication with your father for those twelve
16 years?

17 **A. Yes.**

18 Q. Why did you choose to not speak to your
19 father for those twelve years?

20 **A. I had my reasons.**

21 Q. I need you to tell me what they are, sir.

1 fault that your parents got divorced?

2 MR. STEINER: Objection.

3 THE WITNESS: I don't blame them.
4 Both of them together, I believe.

5 BY MR. HILL:

6 Q. Did you continue to communicate with your
7 mother during the period after the divorce?

8 **A. Yes.**

9 Q. Was there ever a period when you stopped
10 talking to her?

11 **A. Here and there, yes.**

12 Q. Did that have to do with the divorce or
13 were those other issues?

14 **A. I don't remember.**

15 Q. Have you been in continuous contact with
16 your half brother Isaac since the divorce?

17 **A. Yes.**

18 Q. Have you been in continuous communication
19 with your brother Zvi since the divorce?

20 **A. Yes.**

21 Q. Did you ever witness any violence in your

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<p style="text-align: right;">Page 58</p> <p>1 home?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. HILL:</p> <p>5 Q. On which occasions?</p> <p>6 A. Basically on me.</p> <p>7 Q. Who was assaulting you in your home?</p> <p>8 A. My father.</p> <p>9 MR. STEINER: Objection.</p> <p>10 BY MR. HILL:</p> <p>11 Q. What was the nature of the violence that</p> <p>12 your father directed toward you?</p> <p>13 A. I misbehaved so he spanked me.</p> <p>14 Q. Many parents spank their children.</p> <p>15 MR. STEINER: Objection.</p> <p>16 BY MR. HILL:</p> <p>17 Q. Do you believe what your father did --</p> <p>18 MR. STEINER: Ask a question.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Do you believe the spanking you received</p> <p>21 from your father was excessive?</p>	<p style="text-align: right;">Page 60</p> <p>1 BY MR. HILL:</p> <p>2 Q. The abuse that you were referring to was</p> <p>3 the spanking you've described?</p> <p>4 A. Yes.</p> <p>5 Q. Any other violence directed toward you by</p> <p>6 your father other than spank you?</p> <p>7 A. No.</p> <p>8 Q. Can you recall your father directing</p> <p>9 violence toward any other member of the family?</p> <p>10 A. No.</p> <p>11 MR. STEINER: Objection.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Can you recall your father spanking your</p> <p>14 brother Zvi?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: I don't remember.</p> <p>17 BY MR. HILL:</p> <p>18 Q. Can you recall your father ever striking</p> <p>19 your mother?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: No.</p>
<p style="text-align: right;">Page 59</p> <p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: What is excessive?</p> <p>3 BY MR. HILL:</p> <p>4 Q. I'm asking you.</p> <p>5 MR. STEINER: He's asking for a</p> <p>6 translation of the word.</p> <p>7 BY MR. HILL:</p> <p>8 Q. Do you believe it was too much?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: When I think about it</p> <p>11 now, no.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Have you ever characterized your father as</p> <p>14 having abused you?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. HILL:</p> <p>18 Q. Who do you think you told that you were</p> <p>19 abused?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: My psychologist.</p>	<p style="text-align: right;">Page 61</p> <p>1 BY MR. HILL:</p> <p>2 Q. Have you ever directed violence towards</p> <p>3 anyone in your family?</p> <p>4 MR. STEINER: I didn't hear the end</p> <p>5 of the question.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Anyone in your family?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: I pushed my mother</p> <p>10 around.</p> <p>11 BY MR. HILL:</p> <p>12 Q. On how many occasions do you believe you</p> <p>13 pushed your mother around?</p> <p>14 A. Not many.</p> <p>15 Q. Did you ever knock her down?</p> <p>16 A. No.</p> <p>17 Q. Was she ever hurt by you pushing her?</p> <p>18 MR. STEINER: Objection.</p> <p>19 THE WITNESS: No.</p> <p>20 BY MR. HILL:</p> <p>21 Q. Have you ever directed violence towards</p>

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1 any other of your family members?
 2 MR. STEINER: Objection.
 3 THE WITNESS: My brother.
 4 BY MR. HILL:
 5 Q. Which brother?
 6 A. Zvi.
 7 Q. On how many occasions do you believe you
 8 were violent towards Zvi?
 9 MR. STEINER: Objection.
 10 THE WITNESS: Plenty.
 11 BY MR. HILL:
 12 Q. What was the nature of the violence?
 13 A. I don't understand.
 14 Q. How did you hurt him?
 15 A. With my hand, fist.
 16 MR. STEINER: Objection.
 17 BY MR. HILL:
 18 Q. You would hit him with your fists?
 19 A. Yes.
 20 Q. You believe there were numerous occasions
 21 where you hit him with your fist?

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1 MR. STEINER: Objection.
 2 THE WITNESS: Numerous? Many?
 3 BY MR. HILL:
 4 Q. Did you believe you hit your brother with
 5 your fists on more than ten occasions?
 6 A. Probably.
 7 Q. Do you believe you hit him with your fists
 8 on more than 50 occasions?
 9 A. No.
 10 Q. Did Zvi ever have to have medical
 11 treatment as a result of you hitting him?
 12 A. No.
 13 Q. Never needed a bandaid or something like
 14 that?
 15 A. No.
 16 Q. Did Zvi ever hit you back?
 17 A. Yes.
 18 Q. Who typically initiated these fights with
 19 Zvi, you or him?
 20 A. Both of us.
 21 Q. We were talking about the first time you

1 recall being treated by a psychologist or
 2 psychiatrist when you were twelve. What was the
 3 next occasion after that that you recall seeing a
 4 psychiatrist or psychologist?
 5 A. When I was -- a court order.
 6 Q. When were you ordered by the court to see
 7 the psychologist and psychiatrist?
 8 A. When I was 18.
 9 Q. Is that the same court appearance that we
 10 discussed earlier?
 11 A. Yes.
 12 Q. For how long did you have to see the
 13 psychologist or psychiatrist as a result of the
 14 court order?
 15 A. A few months.
 16 Q. Do you remember the name of the person you
 17 saw?
 18 A. No.
 19 Q. Do you remember what city they were in?
 20 A. Ramat HaSharon.
 21 Q. Did those visits with the psychiatrist

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1 help?
 2 A. Yes.
 3 Q. How did they help?
 4 A. I just remember it helping.
 5 Q. What were you talking with that
 6 psychiatrist about?
 7 A. My life.
 8 Q. Did you talk to him about drug use?
 9 A. Yes.
 10 Q. Did the visits with the psychiatrist help
 11 you stay clean?
 12 A. No.
 13 Q. Were you continuing to use drugs while you
 14 were seeing the psychiatrist?
 15 A. Yes.
 16 Q. I think you told me earlier that you were
 17 also being drug tested during this time, is that
 18 right?
 19 MR. STEINER: Objection.
 20 THE WITNESS: Yes.
 21 BY MR. HILL:

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1 Q. Was it during the same period?

2 A. **It was after. It was also before and also**
3 **after.**

4 Q. You saw the psychiatrist before you
5 started the drug testing, is that right?

6 A. **I don't remember.**

7 Q. Do you remember seeing the psychiatrist
8 after the drug testing?

9 A. **I believe so.**

10 Q. While you were taking the drug tests you
11 were not testing positive, correct?

12 A. **Exactly.**

13 Q. Were you, in fact, using drugs while you
14 were taking the test?

15 A. **No.**

16 Q. But then after you stopped taking the test
17 you started using drugs again?

18 A. **Yes.**

19 Q. You were seeing the psychiatrist during
20 that period after you had finished taking the drug
21 tests, right?

1 A. **No, 2011.**

2 Q. Between the time you were 18 and 2011 you
3 are not recollecting any visits with any
4 psychiatrist or psychologist, is that right?

5 A. **I didn't understand your question.**

6 Q. Between the time you saw the psychiatrist
7 or psychologist that the court required you to go to
8 and in sessions that you started in 2011, you don't
9 believe you were having any sort of treatment with
10 the psychiatrist or psychologist?

11 A. **Not at all.**

12 Q. Who did you go see in 2011?

13 A. **Eyal.**

14 Q. Do you know Eyal's last name?

15 A. **I don't remember.**

16 Q. What is Eyal's profession?

17 A. **He's a psychologist.**

18 Q. Where did you go see Eyal?

19 A. **Petach Tikva.**

20 Q. Why did you go see him?

21 A. **Because I felt like I needed to.**

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1 A. **I believe so. I don't remember dates.**

2 Q. Your best recollection is while you were
3 seeing the psychiatrist you were still using drugs,
4 right?

5 A. **I think so.**

6 Q. The drugs you were principally using at
7 that time were marijuana and hash, right?

8 A. **Yes.**

9 Q. In what way did he help you in these
10 visits?

11 MR. STEINER: Objection.

12 THE WITNESS: I really don't
13 remember.

14 BY MR. HILL:

15 Q. After seeing the psychiatrist when you
16 were 18 in accordance with the court order, when is
17 the next time you recollect seeing a psychiatrist or
18 psychologist?

19 A. **Year and a half, two years ago.**

20 Q. So that would have been approximately the
21 year 2010, is that what you're saying.

1 Q. You weren't required by anyone to go see
2 him?

3 A. **No.**

4 Q. How long did you see Eyal?

5 A. **Until today.**

6 Q. You are continuously seeing him?

7 A. **Yes.**

8 Q. You are planning to visit with him again
9 once you return to Israel?

10 A. **Yes.**

11 Q. How frequently have you seen him over that
12 period of time?

13 A. **Lately twice a week.**

14 Q. How long have you been going to see him
15 twice a week?

16 A. **A month, two months, maybe more.**

17 Q. Prior to the last month or two when you
18 were seeing him twice a week how frequently were you
19 seeing him?

20 A. **Once a week.**

21 Q. Did you see him approximately once a week

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<p>1 beginning in 2011 until about a month or two ago?</p> <p>2 A. Yes.</p> <p>3 Q. Has he prescribed any medication for you?</p> <p>4 A. Him, no.</p> <p>5 Q. How long do you spend with Eyal in these</p> <p>6 sessions?</p> <p>7 A. 50 minutes to an hour.</p> <p>8 Q. So this is talk therapy that you are</p> <p>9 doing?</p> <p>10 A. Yes.</p> <p>11 Q. Has it helped you?</p> <p>12 A. Yes.</p> <p>13 Q. What issues have you talked about with</p> <p>14 him?</p> <p>15 A. Everything about me.</p> <p>16 Q. Can you just give me the short version?</p> <p>17 What were the general topics?</p> <p>18 A. My feelings.</p> <p>19 Q. Anything else?</p> <p>20 A. Yes.</p> <p>21 Q. What else?</p>	<p>1 every two months.</p> <p>2 Q. For a period of time you were seeing him</p> <p>3 once a month. Now you are seeing him every other</p> <p>4 month?</p> <p>5 A. Also once a month, sometimes twice a</p> <p>6 month, now once every two months.</p> <p>7 Q. You mentioned that Dr. Kronenberg has</p> <p>8 prescribed some medication for you?</p> <p>9 A. Yes.</p> <p>10 Q. Did he prescribe the two medications you</p> <p>11 described earlier today?</p> <p>12 A. Yes.</p> <p>13 Q. Did you take any other medications that</p> <p>14 Dr. Kronenberg has prescribed for you?</p> <p>15 A. No.</p> <p>16 Q. Those are the only two medications that he</p> <p>17 has prescribed for you that you can require?</p> <p>18 A. No, two different other pills.</p> <p>19 Q. Tell me the names of the other pills.</p> <p>20 A. Respiradal and two others. I don't</p> <p>21 remember.</p>
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<p>1 A. Drug abuse.</p> <p>2 Q. Anything else?</p> <p>3 A. Many of things. It's not comes up to my</p> <p>4 mind right now.</p> <p>5 Q. Since 2011 have you seen any psychiatrist</p> <p>6 or psychologist other than Eyal?</p> <p>7 A. I go to a psychiatrist, yes.</p> <p>8 Q. When did you start seeing the</p> <p>9 psychiatrist?</p> <p>10 A. A few months after I started going to</p> <p>11 Eyal.</p> <p>12 Q. Approximately 2001 as well?</p> <p>13 A. 2011.</p> <p>14 Q. 2011?</p> <p>15 A. Yes.</p> <p>16 Q. What's the name of your psychiatrist?</p> <p>17 A. Seffi Kronenberg.</p> <p>18 Q. Where do you see Dr. Kronenberg?</p> <p>19 A. Tel Aviv.</p> <p>20 Q. How frequently have you seen him?</p> <p>21 A. Once a month. Now twice a month. Once</p>	<p>1 Q. Do you know what the Respiradal is</p> <p>2 supposed to treat?</p> <p>3 A. Calm me down.</p> <p>4 Q. Do you know what the other two pills that</p> <p>5 you can't recall the names of, what they were</p> <p>6 supposed to do for you?</p> <p>7 A. The same thing.</p> <p>8 Q. Did the Respiradal help?</p> <p>9 A. Yes.</p> <p>10 Q. Why did you discontinue that? Why did you</p> <p>11 stop taking that?</p> <p>12 A. Side effects.</p> <p>13 Q. What was the side effect?</p> <p>14 A. No sexual --</p> <p>15 Q. Made you impotent?</p> <p>16 A. Basically.</p> <p>17 Q. It prevented you from getting an erection?</p> <p>18 A. Yes.</p> <p>19 Q. Why did you stop taking the other drugs?</p> <p>20 A. The same thing.</p> <p>21 Q. They affected your sexual performance?</p>

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<p>1 A. Yes.</p> <p>2 Q. Apart from the psychological and</p> <p>3 psychiatric treatment that you've described, do you</p> <p>4 believe you've seen any other psychiatrist or</p> <p>5 psychologists?</p> <p>6 A. Not that's I remember.</p> <p>7 Q. Have you ever been diagnosed as having a</p> <p>8 mental illness?</p> <p>9 A. Yes.</p> <p>10 Q. What diagnoses have you received?</p> <p>11 A. From one doctor, from Seffi, he says I'm</p> <p>12 bipolar and in two different places, I have</p> <p>13 personality disorder.</p> <p>14 Q. Dr. Kronenberg said you where bipolar?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recall who told you you had a</p> <p>17 personality disorder?</p> <p>18 A. Yes, Ger Hospital.</p> <p>19 Q. When did you go to the Ger Hospital?</p> <p>20 A. Probably March 2012.</p> <p>21 Q. Why did you go to did Ger Hospital in</p>	<p>1 Q. Has anyone ever told you that you have</p> <p>2 attention deficit disorder?</p> <p>3 A. I don't know what that is.</p> <p>4 MR. STEINER: Maybe give him the</p> <p>5 acronym.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Has anyone ever told you you have ADD</p> <p>8 or --</p> <p>9 A. ADHD.</p> <p>10 Q. Who do you recollect telling you you had</p> <p>11 ADHD?</p> <p>12 A. When I was in school.</p> <p>13 Q. In school?</p> <p>14 A. Yes.</p> <p>15 Q. Which school?</p> <p>16 A. Michal.</p> <p>17 Q. Do you recall being told that you had ADHD</p> <p>18 before the February 2002 bombing?</p> <p>19 A. Yes.</p> <p>20 Q. Did anyone ever tell you you had something</p> <p>21 called ODD?</p>
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<p>1 March of 2012?</p> <p>2 A. Seffi wanted me to get more intensive</p> <p>3 treatment.</p> <p>4 Q. Were you an inpatient at the hospital for</p> <p>5 a period of time?</p> <p>6 A. I went to day care for a few hours.</p> <p>7 Q. You didn't spend the night there?</p> <p>8 A. No.</p> <p>9 Q. Do you remember the name of the doctors</p> <p>10 who treated you at the hospital?</p> <p>11 A. No.</p> <p>12 Q. But one of the doctors there told you you</p> <p>13 had a personality disorder?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recall anything else they said</p> <p>16 about what the nature of the personality disorder</p> <p>17 was?</p> <p>18 A. No.</p> <p>19 Q. Has anyone ever told you that you have</p> <p>20 oppositional defiant disorder?</p> <p>21 A. I don't understand.</p>	<p>1 A. I think so.</p> <p>2 Q. What's your best recollection about who</p> <p>3 may have told you that you had ODD?</p> <p>4 A. I saw it yesterday.</p> <p>5 Q. Where did you see that?</p> <p>6 A. One of the questions you guys asked me.</p> <p>7 Q. You saw it yesterday on the test you took?</p> <p>8 A. Yes.</p> <p>9 Q. Apart from seeing it yesterday on the</p> <p>10 test, can you recollect anyone telling you that you</p> <p>11 have ODD?</p> <p>12 A. No.</p> <p>13 MR. HILL: Would you like to take a</p> <p>14 break?</p> <p>15 THE WITNESS: A little bit more.</p> <p>16 BY MR. HILL:</p> <p>17 Q. Has anyone else in your family that you</p> <p>18 are aware of been diagnosed as having a mental</p> <p>19 illness?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: My grandmother.</p>

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1 BY MR. HILL:

2 Q. Which grandmother?

3 A. **My mother's.**

4 Q. What was her name?

5 A. **Angela.**6 Q. What mental illness was your grandmother
7 Angela diagnosed as having?8 A. **I have no idea.**9 Q. Do you know if anyone else in your family
10 has ever been diagnosed as having a mental illness?11 A. **No.**

12 MR. STEINER: Objection.

13 BY MR. HILL:

14 Q. Have you ever heard whether your father
15 Michael was diagnosed as having a mental illness?

16 MR. STEINER: Objection.

17 THE WITNESS: No.

18 BY MR. HILL:

19 Q. Have you ever heard that your mother has
20 been diagnosed with having a mental illness?21 A. **My mother hasn't.**

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1 Q. Your mother has not?

2 A. **No.**3 Q. Have you ever heard whether Zvi has been
4 diagnosed as having a mental illness?5 A. **No.**6 Q. Have you ever heard whether Isaac has been
7 diagnosed as having a mental illness?8 A. **No.**9 MR. HILL: Let's take a break here
10 because I'm going to get into a new area.11 (Whereupon, a recess was taken from
12 10:08 a.m. to 10:18 a.m.)13 MR. HILL: Mr. Steiner, I believe we
14 have received some, but not all, the records
15 associated with the psychological and psychiatric
16 treatment that Mr. Thaler has described as a result
17 of the court order, with Eyal, with Dr. Kronenberg,
18 and at the Ger Hospital.19 I also don't believe we've received the
20 records associated with his rehab that he's
21 previously described.

1 I would, therefore, ask that those

2 records be searched for if they are within his
3 possession, custody, or control and be produced.4 MR. STEINER: We will take it under
5 advisement and ask for you to please follow up in
6 writing.

7 BY MR. HILL:

8 Q. Mr. Thaler, you were present on
9 February 16, 2002 at an explosion in Karnei Shomron,
10 correct?11 A. **Correct.**12 Q. Did you see the person or persons who were
13 responsible for causing the explosion before it took
14 place?15 A. **No.**16 Q. You were unable to identify the person or
17 persons who was responsible for that explosion?

18 MR. STEINER: Objection.

19 THE WITNESS: I was looking to the
20 other side.

21 BY MR. HILL:

1 Q. At the time of the blast you were facing
2 away from the source of the blast, correct?3 A. **My face was looking to the left.**4 Q. You were not able to observe the person
5 who caused the blast before it took place, right?6 A. **No.**

7 Q. You are agreeing with me?

8 A. **What?**9 Q. You did not see the person before the
10 blast?11 A. **Right.**12 Q. Did you see Keren Shatsky after the blast
13 that day?14 A. **No.**15 Q. Did you see your sister Rachel after the
16 blast that day?17 A. **No.**18 Q. Did you see Ronit Trattner after the blast
19 that day?20 A. **No.**

21 Q. Did you see Hillel Trattner after the

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1 blast that day?

2 **A. No.**

3 Q. Did you lose consciousness at the time of
4 the blast?

5 **A. No.**

6 MR. STEINER: Objection.

7 MR. HILL: What's the objection?

8 MR. STEINER: To the medical
9 definition of "conscious," the witness'
10 understanding of it.

11 BY MR. HILL:

12 Q. Do you believe you were awake after the
13 explosion took place or was there a period of time
14 you were blacked out?

15 **A. What?**

16 Q. Do you believe that you were continuously
17 awake after the blast?

18 **A. Yes.**

19 Q. Your testimony is to the best of your
20 recollection you do not believe that you blacked out
21 at the time of the blast?

1 and then lost consciousness, is that right?

2 **A. I didn't lose conscious. I just blacked
3 out.**

4 Q. At what point did you again become awake?

5 **A. On and off.**

6 Q. Can you recollect being put into an
7 ambulance?

8 **A. Yes.**

9 Q. Can you recollect traveling in an
10 ambulance?

11 **A. Yes.**

12 Q. Can you recollect arriving at the
13 hospital?

14 **A. Yes.**

15 Q. At some point I understand you had surgery
16 at the hospital?

17 **A. Yes.**

18 Q. I assume that you were unconscious for the
19 surgery?

20 **A. Yes.**

21 Q. Do you recollect the names of any of the

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1 **A. I flew back and I got up straightaway.**

2 Q. After the blast took place did anyone
3 attend to your injuries on the scene?

4 **A. Yes.**

5 Q. Do you know the name of the person or
6 persons who helped you?

7 **A. No.**

8 Q. Were these like paramedics?

9 **A. Yes.**

10 Q. Then I understand you were transported to
11 the hospital, is that correct?

12 **A. Yes.**

13 Q. Can you remember being awake from the time
14 of the blast until you arrived at the hospital?

15 **A. No.**

16 Q. At what point in time do you believe you
17 may have lost consciousness?

18 MR. STEINER: Objection.

19 THE WITNESS: After a few minutes.

20 BY MR. HILL:

21 Q. So you were awake for a while on the scene

1 people that treated you that day?

2 **A. No.**

3 Q. Could you describe for me generally the
4 nature of the injuries you sustained that day?

5 **A. Nails and shrapnel all over my body, nails
6 and shrapnel inside my gall bladder, took out my
7 gall bladder. That left an infection somewhere
8 inside.**

9 **My ear was ripped partly. My eardrum burst
10 totally. Burns, second degree on my body, and one
11 degrees.**

12 Q. You do not appear to me to have any
13 scarring. There is no video camera here. Do you
14 believe you have scarring?

15 MR. STEINER: Objection.

16 The record should reflect that the
17 witness is sitting with his sleeve rolled up to his
18 right elbow and on his right forearm there is a
19 clearly visible scar.

20 THE WITNESS: Scars all over my body
21 that you could see.

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<p>1 BY MR. HILL:</p> <p>2 Q. Do you have any scars on your face?</p> <p>3 A. My neck and the top of my eyebrow.</p> <p>4 Q. You mentioned that there was an injury to</p> <p>5 your ear. Was that surgically repaired?</p> <p>6 A. Yes.</p> <p>7 Q. In what way do the injuries you sustained</p> <p>8 on February 16, 2002 affect your daily living now?</p> <p>9 A. I have stomach problems plus hearing</p> <p>10 problems.</p> <p>11 Q. Anything else?</p> <p>12 A. My arm.</p> <p>13 Q. What's the nature of the issue with the</p> <p>14 arm?</p> <p>15 A. I get tingling through my arm.</p> <p>16 Q. Any other ways that the injuries you</p> <p>17 sustained on February 16, 2002 affect your daily</p> <p>18 living today?</p> <p>19 A. No. Mental mostly.</p> <p>20 Q. You mentioned that you have stomach</p> <p>21 problems. What's the nature of your stomach</p>	<p>1 A. No.</p> <p>2 Q. You mentioned that you had an infection</p> <p>3 after the attack.</p> <p>4 A. Yes.</p> <p>5 Q. What was the nature of the infection?</p> <p>6 A. I don't know the details.</p> <p>7 Q. Did it have something to do with your</p> <p>8 stomach or your intestines?</p> <p>9 A. My gall bladder.</p> <p>10 Q. Do you know what caused the infection?</p> <p>11 A. No.</p> <p>12 Q. Do you know if the infection you had in</p> <p>13 the hospital is related to the problem with</p> <p>14 diarrhea?</p> <p>15 A. I don't know.</p> <p>16 Q. Has anyone ever looked into whether the</p> <p>17 diarrhea could have been caused by the infection in</p> <p>18 the hospital?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MR. HILL:</p>
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<p>1 problems?</p> <p>2 A. Diarrhea.</p> <p>3 Q. Regular condition that you've had since --</p> <p>4 A. Lately it's been better, yes.</p> <p>5 Q. Have you had any treatment for it?</p> <p>6 A. No.</p> <p>7 Q. But it's been improving?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know why it's getting better?</p> <p>10 A. No.</p> <p>11 Q. Has anyone ever recommended a treatment</p> <p>12 for the diarrhea?</p> <p>13 A. No.</p> <p>14 Q. When was the last time you saw a doctor</p> <p>15 about the diarrhea?</p> <p>16 A. A year ago.</p> <p>17 Q. Did the doctor tell you that there was</p> <p>18 anything that could be done to help it?</p> <p>19 A. No.</p> <p>20 Q. Do you know why you have the diarrhea</p> <p>21 after the attack?</p>	<p>1 Q. You mentioned that you have some hearing</p> <p>2 problems.</p> <p>3 A. Yes.</p> <p>4 Q. What's the nature of the hearing problems?</p> <p>5 A. Both ears have loss of hearing.</p> <p>6 Q. Does the loss of hearing prevent you from</p> <p>7 working?</p> <p>8 A. Working, no.</p> <p>9 Q. It's not preventing you from hearing me</p> <p>10 here today?</p> <p>11 A. No.</p> <p>12 Q. Has anyone ever measured how much of your</p> <p>13 hearing has been lost?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recollect approximately what amount</p> <p>16 of hearing you've lost?</p> <p>17 A. No.</p> <p>18 Q. Do you know if you've lost it over certain</p> <p>19 ranges or what the nature of the loss is?</p> <p>20 A. I don't know the details.</p> <p>21 Q. Has anyone ever recommended that you have</p>

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<p>1 a hearing aid?</p> <p>2 A. No.</p> <p>3 Q. Do you believe you need a hearing aid to</p> <p>4 hear?</p> <p>5 A. No.</p> <p>6 Q. Has anyone ever recommended any treatment</p> <p>7 for the ears?</p> <p>8 A. No.</p> <p>9 MR. STEINER: Objection. With the</p> <p>10 exception of the surgery that he had?</p> <p>11 BY MR. HILL:</p> <p>12 Q. You did have surgery on one of the ears,</p> <p>13 right?</p> <p>14 A. Yes.</p> <p>15 Q. Did the hearing improve as a result of the</p> <p>16 surgery?</p> <p>17 A. Approve?</p> <p>18 Q. Improve.</p> <p>19 A. I don't know.</p> <p>20 Q. Was your hearing better after the surgery</p> <p>21 than it had been before the surgery?</p>	<p>1 A. A few years ago.</p> <p>2 Q. Do you feel like you need to see a doctor</p> <p>3 to try and improve your hearing?</p> <p>4 A. Nothing can improve it.</p> <p>5 Q. You mentioned that you have a tingling</p> <p>6 sensation in your arm.</p> <p>7 A. Yes.</p> <p>8 Q. Which arm?</p> <p>9 A. Left arm.</p> <p>10 Q. How frequently do you have this sensation?</p> <p>11 A. Once every half a year and when I work</p> <p>12 out.</p> <p>13 Q. This happens approximately twice a year?</p> <p>14 A. Yes.</p> <p>15 Q. And this happens while you are exercising?</p> <p>16 A. No. That happens whenever I get banged on</p> <p>17 my hand and when I work out I lose, get tingling</p> <p>18 through my arm and don't have strength in my arm.</p> <p>19 Q. Is there any treatment that's been</p> <p>20 recommended for this tingling sensation?</p> <p>21 A. No.</p>
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<p>1 A. I didn't have an eardrum.</p> <p>2 Q. Before the surgery you did not have an</p> <p>3 eardrum in that ear?</p> <p>4 A. And after the surgery, yes.</p> <p>5 Q. Then after the surgery there was an</p> <p>6 eardrum there?</p> <p>7 A. After a few months they put in a new air</p> <p>8 drum.</p> <p>9 Q. After you received a new eardrum did that</p> <p>10 improve the hearing in that ear?</p> <p>11 A. Yes.</p> <p>12 Q. Since the surgery where you got the new</p> <p>13 eardrum have your hearing levels remained constant?</p> <p>14 A. I don't hear the best.</p> <p>15 Q. Has it gotten worse since then or gotten</p> <p>16 better?</p> <p>17 A. Yes.</p> <p>18 Q. Which?</p> <p>19 A. Worse.</p> <p>20 Q. When was the last time you saw a doctor</p> <p>21 about problems with your hearing?</p>	<p>1 Q. Does the tingling sensation prevent you</p> <p>2 from working?</p> <p>3 A. No.</p> <p>4 Q. You mentioned that you had scars.</p> <p>5 A. Yes.</p> <p>6 Q. You mentioned one on your face and</p> <p>7 Mr. Steiner called my attention to one on your arm.</p> <p>8 Where else on your body do you have scars?</p> <p>9 A. My face, my neck, all over my arm, the</p> <p>10 second arm, my stomach, my legs, and my ass.</p> <p>11 Q. Do the scars prevent you from your daily</p> <p>12 living in any way?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: No.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Does the scarring prevent you from</p> <p>17 engaging in any activities that you otherwise would</p> <p>18 like to engage in?</p> <p>19 A. No.</p> <p>20 Q. Doesn't keep you from going to the beach</p> <p>21 or anything like that?</p>

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1 **A. No.**

2 Q. Do you anticipate you will need future
3 medical treatment as a result of the physical
4 injuries you sustained in February of 2002?

5 MR. STEINER: Objection.

6 THE WITNESS: Yes, I believe so.
7 BY MR. HILL:

8 Q. What additional future medical treatment
9 for your physical injuries do you believe you will
10 need in the future?

11 **A. My arm, my ear.**

12 Q. You don't currently have any plans,
13 though, to have treatment on your ears, right?

14 **A. No.**

15 Q. You don't currently have plans to have any
16 treatment on your arm, right?

17 **A. No.**

18 Q. As long as you are living in Israel those
19 treatments will be covered by the Israeli National
20 Insurance, is that your understanding?

21 MR. STEINER: Objection.

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1 THE WITNESS: I don't know.

2 BY MR. HILL:

3 Q. Are your medical expenses typically
4 covered by the Israeli National Insurance?

5 **A. Not all of them.**

6 Q. Have you incurred medical expenses because
7 of your physical injuries that have not been covered
8 by insurance?

9 MR. STEINER: Objection.

10 THE WITNESS: I don't know.

11 BY MR. HILL:

12 Q. We talked earlier that you are currently
13 under some psychological or psychiatric care. Do
14 you anticipate that that will continue in the
15 future?

16 **A. Yes.**

17 Q. You anticipate that you'll continue to see
18 Eyal and Dr. Kronenberg?

19 **A. Yes.**

20 Q. Do you know how long that treatment will
21 continue?

1 **A. As long as it needs.**

2 Q. Are you currently paying anything for
3 those treatments?

4 **A. Yes.**

5 Q. How much are you paying?

6 **A. 450 for a session with Seffi and Eyal is
7 paid by Bituach Leumi.**

8 Q. So you are not paying anything for the
9 treatment with Eyal, right?

10 **A. Once I get -- I'm not paying him -- we're
11 not paying him a full price. Once I get -- when I
12 get money, when I won't have money issues, I'll be
13 paying Eyal a little bit more.**

14 Q. How much do you expect to pay Eyal in the
15 future for your treatment?

16 **A. 70 shekels extra.**

17 Q. 70 shekels on a weekly or bi-weekly basis?

18 **A. Yes.**

19 Q. Then you said it's 450 shekels to see
20 Dr. Kronenberg?

21 **A. Yes.**

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1 Q. You see him now every other month?

2 **A. Yes.**

3 Q. Are you paying any other money for your
4 current psychological, psychiatric treatment?

5 **A. No.**

6 Q. Are you paying anything for the drugs you
7 are taking?

8 **A. Yes.**

9 Q. How much are you paying for those?

10 **A. 600 shekels for two months on Abilify and
11 something like 50, 60 shekels for Respiradal for a
12 month.**

13 Q. Any other medication expenses that you are
14 currently paying for treatment that you believe is
15 related to the February 2002 bombing?

16 **A. No.**

17 Q. Are you aware of any evidence that your
18 sister Rachel experienced any conscious pain or
19 suffering between the time of the blast on
20 February 16, 2002 and the time of her death?

21 **A. Yes. She was screaming after the attack.**

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<p>1 Q. Did you hear her screaming that night?</p> <p>2 A. Yes.</p> <p>3 Q. I believe you told me earlier you didn't</p> <p>4 see her that night. How do you know it was her that</p> <p>5 you were hearing?</p> <p>6 A. I know my sister's voice.</p> <p>7 Q. You said you heard her scream. How long</p> <p>8 did she scream?</p> <p>9 A. I don't know. I don't know the time.</p> <p>10 Q. Was she saying anything or just screaming?</p> <p>11 A. I don't remember.</p> <p>12 Q. Are you aware of any other evidence that</p> <p>13 your sister may have experienced conscious pain or</p> <p>14 suffering between the time of the blast and the time</p> <p>15 she lost consciousness?</p> <p>16 A. Rephrase that.</p> <p>17 Q. Are you aware of any other evidence that</p> <p>18 your sister experienced conscious pain or suffering</p> <p>19 between the time of the blast and the time of her</p> <p>20 death?</p> <p>21 MR. STEINER: Objection. Do you</p>	<p>1 A. Yes.</p> <p>2 Q. Do you know her last name?</p> <p>3 A. Hassan.</p> <p>4 Q. Did Chani Friedman talk to you about</p> <p>5 whether your sister was awake after the attack?</p> <p>6 A. A long time ago.</p> <p>7 Q. Tell me, to the best of your recollection,</p> <p>8 what Chani told you about that.</p> <p>9 A. I don't remember.</p> <p>10 Q. Did Shira Hassan talked to you about</p> <p>11 whether your sister was awake after the bombing?</p> <p>12 A. I heard from Chani.</p> <p>13 Q. Chani told you that Shira had witnessed</p> <p>14 this, right?</p> <p>15 A. I don't remember if it was Shira or</p> <p>16 someone else.</p> <p>17 Q. Chani told you that someone else had also</p> <p>18 observed your sister being awake?</p> <p>19 A. Yes.</p> <p>20 Q. Tell me to the best of your recollection</p> <p>21 what Chani told you about whether your sister was</p>
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<p>1 understand the question?</p> <p>2 THE WITNESS: I understand but -- I</p> <p>3 half understand. From the bomb attack to the</p> <p>4 hospital she was very badly injured and of course</p> <p>5 she went through pain and of course she went through</p> <p>6 suffering all the way through.</p> <p>7 BY MR. HILL:</p> <p>8 Q. Are you aware of any evidence that she was</p> <p>9 awake or conscious at that time other than what you</p> <p>10 said about hearing her scream?</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: Not that I saw.</p> <p>13 BY MR. HILL:</p> <p>14 Q. Are you aware whether anyone else saw</p> <p>15 anything that indicated she was awake between the</p> <p>16 blast and the --</p> <p>17 A. Yes, two of her best friends said that she</p> <p>18 was awake.</p> <p>19 Q. Who told you that?</p> <p>20 A. Chani and Shira.</p> <p>21 Q. Chani Friedman?</p>	<p>1 awake after the bombing.</p> <p>2 A. I don't remember.</p> <p>3 Q. You don't remember?</p> <p>4 A. No.</p> <p>5 Q. Apart from what Chani told you and what</p> <p>6 you recollect about your sister screaming after the</p> <p>7 bombing, are you aware of anything else that</p> <p>8 indicates she may have experienced conscious pain or</p> <p>9 suffering?</p> <p>10 MR. STEINER: Objection. He</p> <p>11 testified to more than what your characterization</p> <p>12 is.</p> <p>13 He testified she was in the ambulance,</p> <p>14 that she was suffering then.</p> <p>15 If you are going to make a conclusion</p> <p>16 about what he said so far and follow it up with</p> <p>17 anything else, I would ask that you include</p> <p>18 everything he said thus far.</p> <p>19 BY MR. HILL:</p> <p>20 Q. You were not with your sister in the</p> <p>21 ambulance, were you?</p>

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1 **A. No.**

2 Q. Have you talked to someone who was with
3 her in the ambulance?

4 **A. No.**

5 Q. Has anyone ever told you about your
6 sister's condition when she was in the ambulance?

7 **A. I was told but I don't remember exactly.**
8 **She was in very critical condition.**

9 Q. Did anyone ever tell you that she was
10 awake while she was in the ambulance?

11 **A. I don't remember.**

12 Q. Can you think of anything else that you
13 haven't told me about so far that may indicate that
14 your sister experienced any conscious pain or
15 suffering after the blast?

16 **A. From hearing what she went through, what**
17 **she had, with all of her injuries, her face all**
18 **ripped up, with her jaw broken, with the shrapnel,**
19 **big shrapnel inside of her head, all of her body,**
20 **burns all over her body, of course she felt**
21 **something. Of course she went through something**

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1 **horrible.**

2 Q. I understand that.

3 MR. STEINER: Objection.

4 BY MR. HILL:

5 Q. I'm just trying to ask if you know of any
6 other evidence that she was awake after the blast
7 other than what you've told me about?

8 MR. STEINER: Objection, asked and
9 answered five times.

10 THE WITNESS: I answered the
11 question.

12 BY MR. HILL:

13 Q. Are you aware of anything you haven't told
14 me about so far?

15 **A. No.**

16 Q. Are you aware of any evidence that Keren
17 Shatsky may have experienced conscious pain and
18 suffering after the blast?

19 **A. No.**

20 Q. Your sister was 16 when she was killed,
21 right?

1 **A. Right.**

2 Q. Had she expressed to you any views or
3 opinions about what she would like to do for a
4 living?

5 **A. No.**

6 Q. Do you have any idea, had she not been
7 killed what she might have done for a living?

8 **A. The best she could.**

9 Q. Are you aware of any efforts to try and
10 calculate what she might have earned had she not
11 been killed?

12 **A. She wasn't working. She died before she**
13 **would be able to work so how could she -- how could**
14 **I know something like that?**

15 Q. I'm just asking you are you aware of any
16 efforts by anyone to try and calculate what she
17 might have earned had she not been killed?

18 **A. How could she earn money if she was not**
19 **working and if she was killed at 16?**

20 Q. I'm just asking do you know if anyone has
21 tried to come up with such a calculation?

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1 **A. No.**

2 Q. Are you claiming in the lawsuit that you
3 will earn less money over your working life than you
4 would have earned had you not been injured on
5 February 16, 2002?

6 MR. STEINER: Objection.

7 THE WITNESS: I didn't understand the
8 question.

9 BY MR. HILL:

10 Q. Obviously since the bombing you've done
11 some work, right?

12 **A. Yes.**

13 Q. I assume you anticipate working in the
14 future, right?

15 **A. Yes.**

16 Q. Are you asking the jury in this lawsuit to
17 pay you money because you will earn less money over
18 your working life?

19 MR. STEINER: Objection.

20 BY MR. HILL:

21 Q. Than you would have earned had you not

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<p>1 been injured in February 2002?</p> <p>2 A. It has nothing to do with one or the</p> <p>3 other.</p> <p>4 Q. What do you mean, sir?</p> <p>5 A. We're claiming my injury, mental injury,</p> <p>6 physical injury, my sister, losing my sister, losing</p> <p>7 my best friend, that's what we're claiming, nothing</p> <p>8 to do with how much I'm making in my life.</p> <p>9 MR. STEINER: Objection.</p> <p>10 BY MR. HILL:</p> <p>11 Q. I just want to be clear. You are not</p> <p>12 claiming that you've lost wages as a result of the</p> <p>13 injuries you sustained on February 16, 2002, is that</p> <p>14 correct?</p> <p>15 A. Wages?</p> <p>16 Q. Money that you get from a job.</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: I believe if I didn't</p> <p>19 go through what I went through I would have been</p> <p>20 somewhere else.</p> <p>21 BY MR. HILL:</p>	<p>1 Republic?</p> <p>2 A. I don't remember names.</p> <p>3 Q. Are you aware of any evidence that the</p> <p>4 Syrian Arab Republic had something to do with the</p> <p>5 bombing in February 2002?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you know if you've sued the Arab Bank?</p> <p>8 A. Yes.</p> <p>9 Q. Are you aware of any evidence that the</p> <p>10 Arab Bank had something to do with the bombing in</p> <p>11 which you were injured?</p> <p>12 A. My lawyers know.</p> <p>13 Q. Apart from what your lawyers know, are you</p> <p>14 aware of any evidence that the Arab Bank had</p> <p>15 something to do with the February 2002 bombing?</p> <p>16 A. Not that I know.</p> <p>17 Q. Do you know if you've sued the Palestinian</p> <p>18 Authority?</p> <p>19 A. I don't know.</p> <p>20 Q. Are you aware of any evidence that the</p> <p>21 Palestinian Authority had something to do with the</p>
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<p>1 Q. At the time of the bombing on February 16,</p> <p>2 2002 did you have any career plans?</p> <p>3 A. No.</p> <p>4 Q. Can you think of a way that we could</p> <p>5 calculate how much money you might have earned had</p> <p>6 you not been injured in February 2002?</p> <p>7 MR. STEINER: Objection.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. HILL:</p> <p>10 Q. Do you know if anyone has attempted to</p> <p>11 come up with such a calculation for your future</p> <p>12 earnings had you not been injured?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: No.</p> <p>15 BY MR. HILL:</p> <p>16 Q. How many lawsuits have you filed as a</p> <p>17 result of this attack in February 2002?</p> <p>18 A. Two.</p> <p>19 Q. Do you know who you sued?</p> <p>20 A. I don't remember the names.</p> <p>21 Q. Do you know if you've sued the Syrian Arab</p>	<p>1 bombing in which you were injured?</p> <p>2 A. Ask that again.</p> <p>3 Q. Are you aware of any evidence that the</p> <p>4 Palestinian Authority had something to do with the</p> <p>5 bombing in which you were injured?</p> <p>6 MR. STEINER: Objection. I suggest</p> <p>7 you use the acronym for the Palestinian Authority as</p> <p>8 well.</p> <p>9 THE WITNESS: A Palestinian kid 16</p> <p>10 years old blew up, did a suicide attack.</p> <p>11 BY MR. HILL:</p> <p>12 Q. You said that you believed the attacker</p> <p>13 was a 16 year old Palestinian kid?</p> <p>14 A. That's what I heard.</p> <p>15 Q. Where did you hear that?</p> <p>16 A. A long time ago.</p> <p>17 Q. Do you remember the source of that</p> <p>18 information?</p> <p>19 A. No.</p> <p>20 Q. Was this from a media report?</p> <p>21 A. I don't remember.</p>

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1 Q. Did a Palestinian tell you this?

2 A. No.

3 Q. Do you think a person told you this or do
4 you think it's something you read or heard on the
5 TV?

6 A. Also on TV and also from people.

7 Q. Do you remember the names of the people
8 that told you this information?

9 A. No.

10 Q. Apart from the information you've just
11 related about the person being 16 years old and
12 being Palestinian, are you aware of any other
13 information that the Palestinian Authority or as
14 it's known as, the PA, had something to do with the
15 attack in which you were injured?

16 A. I didn't hear the question.

17 Q. Apart from what you've just described, the
18 information that you may have read or someone may
19 have told you about the identity of the person that
20 did this, are you aware of any other evidence that
21 the Palestinian Authority had something to do with

1 A. No.

2 Q. Do you remember approximately when you
3 spoke in Texas?

4 A. I don't know, I was 16, 17.

5 Q. You were 16 or 17 years old?

6 A. Don't know.

7 Q. Was this before you moved to Florida to
8 work?

9 A. Yes.

10 Q. Did you travel with anyone to Texas to
11 give these remarks?

12 A. My mother.

13 Q. Did your mother also speak on those
14 occasions?

15 A. Yes.

16 Q. Did you speak more than once in Texas?

17 A. I don't remember.

18 Q. Do you remember what type of place you
19 spoke in? Was it a hotel, was it a synagogue?

20 A. From what I remember, it was a school.

21 Q. Do you remember what you said?

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1 the attack in which you were injured?

2 A. No.

3 Q. Do you know if you've sued the Palestine
4 Liberation Organization?

5 A. Don't know.

6 Q. Are you aware of any evidence that the PLO
7 had something to do with the attack in which you
8 were injured?

9 A. I don't know.

10 Q. Have you ever spoken publicly about your
11 sister's death or about the injuries that you
12 received in February of 2002?

13 A. Yes.

14 Q. On how many occasions do you believe
15 you've publicly spoken about those events?

16 A. A few times.

17 Q. Where do you recollect speaking about
18 those events?

19 A. Texas, England, and South Africa.

20 Q. Do you recall in what city in Texas you
21 spoke about this?

1 A. I didn't speak. I more answered
2 questions.

3 Q. You took questions from the audience and
4 answered them?

5 A. Yes.

6 Q. Did you make any notes or prepare any
7 remarks in advance of that speaking in Texas?

8 A. No.

9 Q. Did you travel to Texas in association
10 with an organization?

11 A. Yes.

12 Q. What organization?

13 A. I think One Family.

14 Q. Who paid for the expenses for your trip to
15 Texas?

16 A. Whoever sent us.

17 Q. You and your mother didn't pay for that
18 trip, as far as you know?

19 A. I don't know.

20 Q. Did you receive any money in connection
21 with speaking?

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1 A. No.

2 Q. Do you know if your mother received any
3 fees for that speech?

4 A. No.

5 Q. Do you know if your mom prepared remarks
6 in advance of the speaking in Texas?

7 A. I don't know.

8 Q. Do you recollect what she said on that
9 occasion?

10 A. What?

11 Q. Do you remember what she said at the
12 speech in Texas?

13 A. No.

14 Q. You mentioned that you had also spoken in
15 England.

16 A. Yes.

17 Q. Approximately when was that?

18 A. A month and a half ago.

19 Q. In what city did you speak in England?

20 A. I don't remember.

21 Q. What place did you speak at, what type of

1 A. How they helped us, how they helped me
2 recover, how good the trips are for us, for our
3 healing, traveling with people that was going
4 through the same injuries, different bombing
5 attacks, different attacks all over Israel.6 Q. You mentioned that you had told the
7 audience in England that One Family had helped you,
8 is that correct?

9 A. Yes.

10 Q. In what way did One Family help you?

11 A. They helped me going to all kind of
12 meetings. Not meetings.13 Going to all kind of therapy treatments,
14 trips that they gave to us.15 Q. You mentioned that One Family had helped
16 you go to meetings or therapy trips, is that right?17 A. All kind of therapy and calming your body,
18 stuff like that.19 Q. You said that One Family had also sent you
20 on trips.

21 A. Yes.

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1 place?

2 A. Synagogue.

3 Q. Do you remember the name?

4 A. No.

5 Q. What did you say a month and a half ago at
6 the synagogue?7 A. A little information about me and more
8 about the organization we flew with.

9 Q. Was that One Family again?

10 A. One Family.

11 Q. Were you soliciting donations for One
12 Family?

13 MR. STEINER: Objection.

14 THE WITNESS: What's that?

15 BY MR. HILL:

16 Q. Were you asking people to give money to
17 One Family?18 A. We weren't asking. We were saying our
19 stories.20 Q. What did you say about One Family on the
21 occasion that you spoke in England?1 Q. On how many occasions do you think One
2 Family sent you on a trip?

3 A. Three times.

4 Q. Where did you go on those trips?

5 A. Once to France, England, and Eilat.

6 Q. When was the trip to France?

7 A. I don't remember.

8 Q. What did you do on that trip to France?

9 A. Had fun.

10 Q. Do you remember where in France you went
11 to?

12 A. No. Yes, Marseille.

13 Q. Marseille?

14 A. Yes.

15 Q. What time of year did you go?

16 A. I don't remember.

17 Q. Who were you traveling with?

18 A. Different injured people.

19 Q. Was anyone in your family on that trip
20 with you?

21 A. No.

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1 Q. Was anyone else who was injured in the
2 bombing in which you were injured on that trip?
3 A. **No.**
4 Q. How long of a trip was it?
5 A. **A week.**
6 Q. Did you have to pay anything for that
7 trip?
8 A. **No.**
9 Q. You mentioned that you had also -- you
10 also traveled to England with One Family.
11 Approximately when was that?
12 A. **A month and a half ago.**
13 Q. What did you do on that trip?
14 A. **Same thing, just had fun.**
15 Q. What cities or towns did you visit in
16 England?
17 A. **London.**
18 Q. Any place else?
19 A. **No.**
20 Q. Who were you traveling with on that trip?
21 A. **Different people that were in attacks.**

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1 Q. Were any of your family members on that
2 trip to England?
3 A. **No.**
4 Q. Was anyone else who was injured in the
5 attack in which you were injured on that trip to
6 England?
7 A. **No.**
8 Q. How long was your trip to England?
9 A. **One week.**
10 Q. Did you have to pay anything for that
11 trip?
12 A. **No.**
13 Q. You mentioned that One Family had also
14 sent you to Eilat.
15 A. **Yes.**
16 Q. That's on the Dead Sea, right?
17 A. **No.**
18 Q. Where is it?
19 A. **The lowest place in Israel.**
20 Q. Is it on a beach?
21 A. **Yes.**

1 Q. When was that trip?
2 A. **A few years ago.**
3 Q. Was it before or after the trip to France?
4 A. **After.**
5 Q. Between France and England you went to
6 Eilat?
7 A. **Yes.**
8 Q. What did you do on that trip?
9 A. **Same thing, tried to show us fun.**
10 Q. How long were you there?
11 A. **For a week.**
12 Q. Were your companions other folks who had
13 been injured in terror attacks?
14 A. **What?**
15 Q. Who did you travel with?
16 A. **Other victims of terror.**
17 Q. Were any of your family members on that
18 trip?
19 A. **Yes, my brother.**
20 Q. Which brother?
21 A. **Zvi.**

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1 Q. Did you pay anything for that trip?
2 A. **No.**
3 Q. Do you know if Zvi has been on any other
4 trips of the type you've described here?
5 A. **Yes.**
6 Q. Where has Zvi gone besides Eilat?
7 A. **England.**
8 Q. He was also on the trip to England?
9 A. **A different year.**
10 Q. Anywhere else he's gone other than Eilat
11 and England?
12 A. **Not that I know.**
13 Q. Was it the same sort of trip you took to
14 England?
15 A. **Yes.**
16 Q. What you are saying is on your most recent
17 trip to England, part of that trip involved you
18 speaking at a synagogue and describing how One
19 Family had sponsored you on these trips and how they
20 helped, right?
21 MR. STEINER: Objection.

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<p>1 THE WITNESS: No.</p> <p>2 BY MR. HILL:</p> <p>3 Q. Was the speaking engagement in England on</p> <p>4 a different trip?</p> <p>5 A. What?</p> <p>6 Q. You've described a trip that One Family</p> <p>7 paid for where you went to England, right?</p> <p>8 A. Yes.</p> <p>9 Q. You've said that you spoke in a synagogue</p> <p>10 in England?</p> <p>11 A. Yes.</p> <p>12 Q. Was that part of the same trip?</p> <p>13 A. Yes.</p> <p>14 Q. Other than the three trips to France,</p> <p>15 England, and Eilat that you've described, have you</p> <p>16 gone to any other meetings sponsored by One Family?</p> <p>17 A. No.</p> <p>18 Q. Did anyone record your remarks in Texas or</p> <p>19 England?</p> <p>20 A. No.</p> <p>21 Q. You mentioned you've also spoken in</p>	<p>1 those cities?</p> <p>2 A. I'm not for sure.</p> <p>3 Q. Do you recall speaking more than once on</p> <p>4 the South African trip?</p> <p>5 A. I don't remember.</p> <p>6 Q. What did you say on the occasion that you</p> <p>7 spoke in South Africa?</p> <p>8 A. Just answered questions.</p> <p>9 Q. Similar to what you've done in Texas?</p> <p>10 A. Yes.</p> <p>11 Q. Was the trip to South Africa also</p> <p>12 sponsored by One Family?</p> <p>13 A. Yes.</p> <p>14 Q. Did you pay anything for that trip?</p> <p>15 A. No.</p> <p>16 Q. Did anyone from your family accompany you</p> <p>17 on that trip?</p> <p>18 A. Yes.</p> <p>19 Q. Who?</p> <p>20 A. My mother and brother.</p> <p>21 Q. Which brother?</p>
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<p>1 South Africa?</p> <p>2 A. Yes.</p> <p>3 Q. When was that?</p> <p>4 A. I don't remember.</p> <p>5 Q. Was it before the trip to England?</p> <p>6 A. Yes.</p> <p>7 Q. Was it before the trip to Texas?</p> <p>8 A. Maybe after.</p> <p>9 Q. Was this before you had come to work in</p> <p>10 the United States or after that?</p> <p>11 A. Before.</p> <p>12 Q. How long did you travel to South Africa?</p> <p>13 A. I believe a week.</p> <p>14 Q. On how many occasions did you speak on</p> <p>15 that trip to South Africa?</p> <p>16 A. A few times.</p> <p>17 Q. Do you remember where you spoke?</p> <p>18 A. No.</p> <p>19 Q. Do you remember what cities you visited?</p> <p>20 A. Cape Town, Johannesburg, and Dahub.</p> <p>21 Q. Do you believe you spoke in all three of</p>	<p>1 A. Zvi.</p> <p>2 Q. Did your mother speak on that trip in</p> <p>3 South Africa?</p> <p>4 A. Yes.</p> <p>5 Q. How many times do you think she spoke on</p> <p>6 that trip?</p> <p>7 A. Three or four maybe.</p> <p>8 Q. Did Zvi speak on that trip?</p> <p>9 A. I don't know. I don't remember.</p> <p>10 Q. What sort of places did your mother speak</p> <p>11 in South Africa? Was it hotels, synagogues, do you</p> <p>12 recall?</p> <p>13 A. Schools.</p> <p>14 Q. Did you go on a safari or anything like</p> <p>15 that?</p> <p>16 A. Yes.</p> <p>17 Q. How long did you go for?</p> <p>18 A. A day.</p> <p>19 Q. Apart from what you've described as</p> <p>20 speaking in Texas, England, and South Africa, can</p> <p>21 you think of any other occasions when you have</p>

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1 spoken publicly about the events of February 16,
2 2002?

3 **A. Publicly, no.**

4 Q. Obviously you've spoken to many people
5 privately but those are the only occasions you can
6 recall addressing an audience about that subject,
7 correct?

8 MR. STEINER: Objection.

9 THE WITNESS: Yes.

10 BY MR. HILL:

11 Q. Have you ever been interviewed by the
12 press or media about the events of February 16,
13 2002?

14 **A. No.**

15 Q. Do you know if your mother has spoken to
16 the press about the events of February 16, 2002?

17 **A. Yes.**

18 Q. On how many occasions do you recall your
19 mother speaking to the press about the events of
20 February 16, 2002?

21 **A. I know about one.**

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1 Q. Which one are you thinking of?

2 **A. With Yair Lapid.**

3 Q. Was that a TV interview?

4 **A. Yes.**

5 Q. Was her interview broadcast?

6 **A. Yes.**

7 Q. Do you know what channel it was on?

8 **A. 2, probably.**

9 Q. Have you ever seen a recording of that
10 broadcast?

11 **A. No.**

12 Q. When your mother was interviewed by
13 Mr. Lapid was that in English or Hebrew?

14 **A. I don't know.**

15 Q. Do you know if anyone has a recording of
16 your mother's interview with Mr. Lapid?

17 **A. I don't know.**

18 Q. Any other occasions when your mother spoke
19 to the press or media about February 16, 2002 that
20 you can recall?

21 **A. What?**

1 Q. Can you think of any other occasions when
2 your mother spoke to anyone from the media or press
3 about the February 16, 2002 bombing, other than what
4 you've just described?

5 **A. No.**

6 Q. Do you know if your father has ever spoken
7 to the press about those events?

8 **A. No.**

9 Q. Do you know if your brother Zvi has ever
10 spoken to the press about those events?

11 **A. Not that I know.**

12 Q. Do you know if your brother Isaac has ever
13 spoken to the press?

14 **A. I don't know.**

15 Q. At the time of the bombing on February 16,
16 2002 was your mother working?

17 **A. I don't remember.**

18 Q. Has she had a job since the February 16,
19 2002 bombing?

20 **A. Maybe in the beginning.**

21 Q. Where do you recollect her working after

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1 the bombing?

2 **A. I'm not sure. She was a secretary.**

3 Q. Do you remember the name of the company
4 that she worked for?

5 **A. No.**

6 Q. Do you remember where the company was
7 located?

8 **A. No.**

9 Q. Are you able to say whether she was
10 working as a secretary before the bombing or
11 afterwards?

12 **A. I think she was. I'm not sure.**

13 Q. Do you know if your mother has done any
14 work out of the home since the bombing?

15 **A. Yes.**

16 Q. What does she do?

17 **A. Something with computers.**

18 Q. Do you know how much money she makes doing
19 that?

20 **A. No idea.**

21 Q. Do you think your mother has made less

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<p>1 money than she would have had the bombing not taken</p> <p>2 place?</p> <p>3 A. I have no idea.</p> <p>4 Q. Was your father working at the time of the</p> <p>5 bombing in February 2002?</p> <p>6 A. I don't know.</p> <p>7 Q. He was not living with you at that time?</p> <p>8 A. No.</p> <p>9 Q. He was living in Florida?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know if your father has made less</p> <p>12 money as a result of the bombing than he otherwise</p> <p>13 would have?</p> <p>14 A. Yes.</p> <p>15 Q. Tell me what you mean by that.</p> <p>16 A. My father doesn't work.</p> <p>17 Q. You believe he doesn't work because of the</p> <p>18 bombing?</p> <p>19 A. Probably.</p> <p>20 Q. Why are you saying that?</p> <p>21 A. I believe he took it pretty hard.</p>	<p>1 Q. When did he last work?</p> <p>2 A. I don't know.</p> <p>3 Q. After your parents divorced was your</p> <p>4 father sending your mother money for you and your</p> <p>5 siblings?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you believe that Zvi will make less</p> <p>8 money over his working life because of the bombing</p> <p>9 than he otherwise would have earned?</p> <p>10 A. I don't know.</p> <p>11 Q. Do you know if Isaac has made less money</p> <p>12 because of the bombing?</p> <p>13 A. I don't know.</p> <p>14 Q. Have you received any money from any</p> <p>15 source since the bombing because of your injuries?</p> <p>16 A. Yes.</p> <p>17 Q. What money have you received?</p> <p>18 A. I receive from the government.</p> <p>19 Q. What do you receive?</p> <p>20 A. Money.</p> <p>21 Q. How much?</p>
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<p>1 Q. Why do you think that?</p> <p>2 A. That's what I think.</p> <p>3 Q. Has he told you that?</p> <p>4 A. No.</p> <p>5 Q. At the time the bombing took place, was</p> <p>6 that in the period when you were not speaking to</p> <p>7 your father?</p> <p>8 A. Yes.</p> <p>9 Q. Have you spoken to him about the effect of</p> <p>10 the bombing on him?</p> <p>11 A. No.</p> <p>12 Q. Why do you think he made less money?</p> <p>13 A. It's my thoughts.</p> <p>14 Q. But that's not based on anything he said</p> <p>15 to you?</p> <p>16 A. No.</p> <p>17 Q. You, in fact, don't know what work, if</p> <p>18 any, he's done since that time?</p> <p>19 A. No.</p> <p>20 Q. Is he working currently?</p> <p>21 A. No.</p>	<p>1 A. Until a few months ago I got a thousand.</p> <p>2 Now I'm getting 2500 until July. In July it's going</p> <p>3 down.</p> <p>4 Q. For a period of time you were receiving</p> <p>5 1000 shekels a month, is that correct?</p> <p>6 A. That's right.</p> <p>7 Q. When did that start?</p> <p>8 A. After the attack.</p> <p>9 Q. Shortly after the February 2002 attack you</p> <p>10 started receiving 1000 shekels a month from the</p> <p>11 Israeli government?</p> <p>12 A. I don't remember when.</p> <p>13 Q. Do you remember receiving that money</p> <p>14 before you turned 18?</p> <p>15 A. I think it was closed until I was 18 and</p> <p>16 after I was 18 I was able to touch the money.</p> <p>17 Q. There was an account that the money was</p> <p>18 being deposited in and when you turned 18 you could</p> <p>19 access the money?</p> <p>20 A. I think so.</p> <p>21 Q. Since then you've continued to receive</p>

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<p>1 1000 shekels a month until recently when it was 2 increased to 2500? 3 A. Yes. 4 Q. You believe that in the future it will be 5 reduced? 6 A. It's going to be reduced. 7 Q. Do you know to what amount? 8 A. I don't know. 9 Q. Why do you think it's going to be reduced? 10 A. Because now I never had a psychiatric, a 11 claim to the government, and now from last July I 12 did, I claimed also psychiatric, a percentage of 13 disability. 14 Q. Prior to last July you had claimed a 15 percentage of disability based on your physical 16 injuries, right? 17 A. Yes. 18 Q. Had you received a percentage of 19 disability from the Israeli government? 20 A. What? 21 Q. Had the Israeli government told you what</p>	<p>1 A. I have no idea. 2 Q. So you know it will be reduced, you just 3 don't know what your new percentage will be? 4 A. Yes. 5 Q. Is the amount of your payment related to 6 the percentage? 7 A. Yes. 8 Q. So you expect the payment to go down 9 because the percentage is supposed to be going down? 10 A. Yes. 11 Q. When do you expect to find out what your 12 new percentage is? 13 A. In July. Check with the doctor again. 14 Q. So you have to go see the National 15 Insurance doctor to evaluate you in July of 2013? 16 A. Yes. 17 Q. Have you previously been evaluated by 18 National Insurance doctors? 19 A. What? 20 Q. When you got the original disability 21 rating did you have to go see a doctor from the</p>
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<p>1 percent disabled you were? 2 A. I was 27. 3 Q. That was based on your physical injuries? 4 A. Yes. 5 Q. Has that 27 percent changed over time? 6 A. Right now. 7 Q. Then in July you said something like I'm 8 also disabled because of a mental health injury, 9 right? 10 A. Yes. 11 Q. Then was your disability percentage 12 changed? 13 A. Yes. 14 Q. What was it? 15 A. 48 for a while, not forever. 16 Q. You believe it's going to go down in the 17 future because you expect the 48 to be reduced? 18 A. It's going to be. 19 Q. You were already told this? 20 A. Yes. 21 Q. What will it be reduced to?</p>	<p>1 National Insurance? 2 A. Yes. 3 Q. When was that? 4 A. 2000 something. 5 MR. HILL: It would appear that the 6 evaluation that Mr. Thaler is referring to is 7 responsive to our discovery request. I ask if it's 8 within his possession, custody, or control that it 9 be located and be produced. 10 MR. STEINER: I believe a search has 11 been made for all the discovery requests made of us. 12 There's no testimony in this deposition 13 that the witness is in possession of anything. 14 We'll take your request under advisement and ask you 15 to please follow up in writing. 16 MR. HILL: I'm also asking for things 17 that are within his control, and I believe this 18 material would be within his control since it's in 19 his government file. 20 MR. STEINER: Take it under 21 advisement.</p>

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<p>1 BY MR. HILL:</p> <p>2 Q. You mentioned you had been evaluated in</p> <p>3 July of 2012?</p> <p>4 A. Yes.</p> <p>5 Q. That's where you received the 48 rating?</p> <p>6 A. Yes.</p> <p>7 MR. HILL: Mr. Steiner, I'd like the</p> <p>8 2012 evaluation as well.</p> <p>9 MR. STEINER: Same response.</p> <p>10 MR. HILL: Just for the record,</p> <p>11 Mr. Steiner, when he is reevaluated in 2013 I assume</p> <p>12 that would be responsive and should be produced as</p> <p>13 well.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Have you ever written anything about the</p> <p>16 events of February 16, 2002?</p> <p>17 A. No.</p> <p>18 Q. You've never written in a journal or</p> <p>19 anything like that?</p> <p>20 A. No.</p> <p>21 Q. What is your e-mail address?</p>	<p>1 Q. But you have not, in fact, looked in the</p> <p>2 e-mail accounts for such documents?</p> <p>3 A. I have ten e-mails maybe so I know it's</p> <p>4 not there.</p> <p>5 Q. You are saying there's only ten e-mails</p> <p>6 in your account?</p> <p>7 A. Yes.</p> <p>8 Q. Do you believe you've received e-mails</p> <p>9 about the events of February 2002 or the lawsuits</p> <p>10 you filed?</p> <p>11 A. Yes.</p> <p>12 Q. Have you maintained those e-mails?</p> <p>13 A. No.</p> <p>14 Q. Did anyone tell you that's you needed to</p> <p>15 maintain those e-mails?</p> <p>16 MR. STEINER: Objection.</p> <p>17 THE WITNESS: No.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Do you own any computers?</p> <p>20 A. Yes.</p> <p>21 Q. How many?</p>
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<p>1 A. Leor_Thaler@Hotmail.com.</p> <p>2 Q. Since 2002 have you had any other e-mail</p> <p>3 addresses other than the one you just mentioned?</p> <p>4 A. Yes.</p> <p>5 Q. What?</p> <p>6 A. Leor.Thaler@Gmail.com.</p> <p>7 Q. Any other e-mail addresses?</p> <p>8 A. No.</p> <p>9 Q. Can you still access both of those</p> <p>10 accounts?</p> <p>11 A. The Hotmail yes. The Gmail I haven't gone</p> <p>12 into in years.</p> <p>13 Q. Have you searched in those e-mail</p> <p>14 accounts to see if there are documents that are</p> <p>15 responsive to the materials the defendants have</p> <p>16 asked for in the lawsuit?</p> <p>17 A. I don't have.</p> <p>18 Q. You say you don't have but have you looked</p> <p>19 in those accounts to see if you have material?</p> <p>20 A. I know what I have in my e-mail. I</p> <p>21 don't have any documents.</p>	<p>1 A. One.</p> <p>2 Q. Have you conducted a search of your</p> <p>3 computer to determine if there are documents on the</p> <p>4 computer that are responsive to the discovery</p> <p>5 request in this lawsuit?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: I never had documents</p> <p>8 on my computer about it.</p> <p>9 BY MR. HILL:</p> <p>10 Q. But you have not, in fact, searched your</p> <p>11 computer to determine if you have such documents?</p> <p>12 A. I know what I have on my computer.</p> <p>13 Q. You have not searched your computer to</p> <p>14 determine if you have documents that are responsive</p> <p>15 to the discovery requests, right?</p> <p>16 MR. STEINER: Objection.</p> <p>17 THE WITNESS: I never put on my</p> <p>18 computer any documents.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Regardless of whether you think there are</p> <p>21 documents on the computer, you've not looked for</p>

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1 such documents, right?

2 MR. STEINER: Objection.

3 THE WITNESS: No.

4 MR. HILL: Mr. Stein, I would request
5 that a reasonable search be conducted of the
6 witness' computer and e-mail accounts to determine
7 if there are, in fact, responsive documents.

8 MR. STEINER: I would not agree with
9 your theory that based on the testimony that's been
10 elicited that a reasonable search has not been
11 conducted, but we'll take it under advisement and
12 ask that you make the request in writing.

13 BY MR. HILL:

14 Q. Do you have any documents at your home
15 that relate to February 16, 2002?

16 A. No.

17 Q. You don't have a file or a box that you
18 put things in?

19 A. No.

20 Q. Do you have any mementos of the attack?

21 A. What's a memento?

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1 Q. Have you saved anything, a physical thing
2 related to the attack that was saved?

3 A. For a while.

4 Q. What was that?

5 A. The T-shirt that I was wearing.

6 Q. When did you dispose of that T-shirt?

7 A. I don't remember.

8 Q. Approximately how many years ago do you
9 think you threw that out?

10 A. Maybe I kept it for a few months.

11 Q. At the time of the attack on February 16,
12 2002 -- are you asking to be paid money in this
13 lawsuit for an injury to your sex life related to
14 the attack in February 2002?

15 MR. STEINER: Objection.

16 THE WITNESS: The question about my
17 sex life?

18 BY MR. HILL:

19 Q. I have to ask because of the way --

20 MR. STEINER: He's already testified
21 about some of the effects. Rephrase your question.

1 BY MR. HILL:

2 Q. Let me ask you this. You understand that
3 you are a plaintiff from the lawsuit, right?

4 A. Yes.

5 Q. You are making claims for certain money
6 that you want to be paid as a result of the injuries
7 you received, correct?

8 A. Yes.

9 Q. Are you asking to be paid money for harm
10 to your sex life as a result of the bombing?

11 MR. STEINER: Objection.

12 THE WITNESS: If you are talking
13 about the pills I took, that it bothered my
14 erections, so it's included.

15 BY MR. HILL:

16 Q. You believe that the side effects from the
17 medication were caused by the bombing?

18 A. Everything started at the bombing. That's
19 where everything started and got worse.

20 Q. Are you able to say whether you would have
21 needed to take that medication had the bombing not

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1 taken place?

2 A. You never know.

3 Q. Apart from the side effects of the
4 medication that you've described, have you had any
5 other sexual problems?

6 A. No.

7 Q. Do you have any dissatisfaction with your
8 sex life that you believe is related to the bombing?

9 A. No.

10 Q. Have you ever been convicted of a crime?

11 A. Yes.

12 Q. What crime were you convicted of?

13 A. Drugs.

14 Q. In what jurisdiction were you convicted of
15 that crime?

16 A. Possession.

17 Q. Was this in Israel or the United States?

18 A. Israel.

19 MR. STEINER: Objection.

20 BY MR. HILL:

21 Q. What year were you convicted of possession

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<p style="text-align: right;">Page 146</p> <p>1 of drugs?</p> <p>2 A. I think I might have mixed up. Convicted</p> <p>3 is to get a file opened, to go to jail, something</p> <p>4 like that?</p> <p>5 Q. Has a judge or a jury ever found you</p> <p>6 guilty of a crime?</p> <p>7 A. No.</p> <p>8 Q. When you referred to being convicted of</p> <p>9 possession of drugs, is that what we discussed</p> <p>10 earlier where you had to go to court and had testing</p> <p>11 and that sort of thing?</p> <p>12 A. Yes.</p> <p>13 Q. But your understanding is that you were</p> <p>14 never convicted of a crime in connection with that?</p> <p>15 A. Yes.</p> <p>16 MR. HILL: Let's take a break. I</p> <p>17 think I may be done but I just want to go over my</p> <p>18 notes.</p> <p>19 (Whereupon, a recess was taken from</p> <p>20 11:11 a.m. to 11:20 a.m.)</p> <p>21 BY MR. HILL:</p>	<p style="text-align: right;">Page 148</p> <p>1 A. Yes.</p> <p>2 Q. Have you ever described what your father</p> <p>3 said to you as being verbal violence?</p> <p>4 A. Yes.</p> <p>5 Q. Who did you tell?</p> <p>6 A. What's verbal?</p> <p>7 Q. Verbal violence.</p> <p>8 A. What is verbal?</p> <p>9 Q. With words.</p> <p>10 A. I don't remember, but probably.</p> <p>11 Q. Could you describe what this verbal</p> <p>12 violence that your father directed toward you was?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: I don't remember.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Do you remember him saying hurtful things</p> <p>17 to you?</p> <p>18 A. I was a sensitive kid, so yes.</p> <p>19 Q. What sort of things do you recall him</p> <p>20 saying?</p> <p>21 A. I don't remember.</p>
<p style="text-align: right;">Page 147</p> <p>1 Q. Mr. Thaler, have you ever had</p> <p>2 communications with anyone in the United States</p> <p>3 government about the bombing in February 2002?</p> <p>4 A. No.</p> <p>5 Q. Ever spoken with anyone in the Israeli</p> <p>6 government about it?</p> <p>7 A. No.</p> <p>8 Q. Ever spoken to anyone from the Palestinian</p> <p>9 Authority?</p> <p>10 A. No.</p> <p>11 Q. Ever spoken to anyone from the PLO?</p> <p>12 A. No.</p> <p>13 Q. We talked earlier about your parents'</p> <p>14 divorce. Prior to the divorce did your father</p> <p>15 verbally abuse you?</p> <p>16 MR. STEINER: Objection.</p> <p>17 THE WITNESS: My father used to</p> <p>18 punish me when he needed to.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Would that involve saying things to you</p> <p>21 that were hurtful?</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. But you do recall his words hurting you</p> <p>2 prior to the divorce?</p> <p>3 MR. STEINER: Objection.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. HILL:</p> <p>6 Q. You would have verbal arguments with him</p> <p>7 before he left the house?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. HILL:</p> <p>11 Q. There were also occasions you mentioned</p> <p>12 when he spanked you.</p> <p>13 Can you ever recall getting into a pushing</p> <p>14 match with your father?</p> <p>15 A. What?</p> <p>16 Q. Any sort of fight with your father,</p> <p>17 physical fight?</p> <p>18 A. No.</p> <p>19 Q. Can you recall ever getting into a</p> <p>20 physical fight with your sister?</p> <p>21 MR. STEINER: Objection.</p>

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<p>1 THE WITNESS: Kids, teenagers.</p> <p>2 BY MR. HILL:</p> <p>3 Q. You mentioned earlier that you and Zvi had</p> <p>4 exchanged blows. Did you and Rachel ever exchange</p> <p>5 blows?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: Probably, yes.</p> <p>8 BY MR. HILL:</p> <p>9 Q. On approximately how many occasions do you</p> <p>10 think that might have happened?</p> <p>11 A. Not too much.</p> <p>12 Q. Was she ever injured and needed treatment</p> <p>13 as a result of those fights?</p> <p>14 A. No.</p> <p>15 Q. How about you, did you ever have an injury</p> <p>16 as a result of a fight with Rachel?</p> <p>17 A. No.</p> <p>18 Q. Do you think you fought with Zvi more</p> <p>19 frequently than you fought with Rachel?</p> <p>20 A. Yes.</p> <p>21 Q. Can you remember having fights, physical</p>	<p>1 parents?</p> <p>2 A. I have no idea.</p> <p>3 Q. Can you remember arguing with your father</p> <p>4 and mother about the decision to move to Israel?</p> <p>5 A. No.</p> <p>6 Q. Did the decision to move to Israel have</p> <p>7 anything to do with you tearing the tiles off the</p> <p>8 roof of the house?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: That was in Israel.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Were you angry about moving there, is that</p> <p>13 why you decided to tear the tiles off the house?</p> <p>14 MR. STEINER: Objection. I don't</p> <p>15 think the testimony was he tore the tiles off the</p> <p>16 roof. I think he testified he threw tiles off the</p> <p>17 roof.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Where did the tiles come from that you</p> <p>20 were throwing off the roof?</p> <p>21 A. The tiles?</p>
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<p>1 fights, with Isaac when he lived in the home?</p> <p>2 A. No.</p> <p>3 Q. Have you ever told anyone that the</p> <p>4 decision to move from Baltimore to Israel caused a</p> <p>5 crisis in your family?</p> <p>6 A. Not that I remember.</p> <p>7 Q. Do you believe that moving to Israel</p> <p>8 caused a crisis in your family?</p> <p>9 A. No.</p> <p>10 Q. Did it cause any difficulty in your</p> <p>11 family?</p> <p>12 A. Yes.</p> <p>13 Q. In what way?</p> <p>14 MR. STEINER: Objection.</p> <p>15 THE WITNESS: The move, eight years,</p> <p>16 I was a nine year old kid, going to a different</p> <p>17 country, different language, of course it's hard for</p> <p>18 a nine year old kid.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Was the decision to move from Baltimore to</p> <p>21 Israel a source of arguments between you and your</p>	<p>1 Q. You actually removed the tiles from the</p> <p>2 roof and then threw them off the roof?</p> <p>3 A. Yes.</p> <p>4 Q. Do you remember why you were doing that?</p> <p>5 A. No.</p> <p>6 Q. Have you ever told anyone that you've had</p> <p>7 paranoia?</p> <p>8 A. Yes.</p> <p>9 Q. Who did you tell that?</p> <p>10 A. My psychologist.</p> <p>11 Q. What did you mean when you said that you</p> <p>12 were having paranoia?</p> <p>13 A. I was imagining things.</p> <p>14 Q. When were you having these paranoid</p> <p>15 thoughts?</p> <p>16 A. A few years ago.</p> <p>17 Q. What sorts of things were you imagining?</p> <p>18 A. I was always -- I was walking down</p> <p>19 streets, always looking for the next Arab that was</p> <p>20 going to hurt me, that was going to do something to</p> <p>21 me, I was thinking people were going to attack me.</p>

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<p>1 Q. Did anyone, in fact, attack you?</p> <p>2 A. No.</p> <p>3 MR. STEINER: Objection, with the</p> <p>4 exception of -- talking about after February 16?</p> <p>5 BY MR. HILL:</p> <p>6 Q. Paranoid thoughts you are describing, they</p> <p>7 happened after the bombing, right?</p> <p>8 A. Yes.</p> <p>9 Q. Apart from the bombing itself, you've</p> <p>10 never been attacked by anyone, right?</p> <p>11 A. No.</p> <p>12 Q. You've gotten into some fights but those</p> <p>13 have been fights that you started?</p> <p>14 MR. STEINER: Objection.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Did anyone pick a fight with you?</p> <p>17 A. Yes.</p> <p>18 Q. On how many occasions?</p> <p>19 A. Many.</p> <p>20 Q. There have been occasions you picked</p> <p>21 fights with other people?</p>	<p>1 to attack you is because you had come to believe you</p> <p>2 were a spy, right?</p> <p>3 A. No.</p> <p>4 MR. STEINER: Objection.</p> <p>5 BY MR. HILL:</p> <p>6 Q. Why did you believe people were going to</p> <p>7 attack you?</p> <p>8 A. That was my feelings, what my thoughts</p> <p>9 were.</p> <p>10 Q. Part of these thoughts involved believing</p> <p>11 that you were working as a spy for some government?</p> <p>12 A. No.</p> <p>13 Q. Tell me what you thought about being a</p> <p>14 spy.</p> <p>15 A. I understood a year afterwards that</p> <p>16 because of watching that show I believed I had to</p> <p>17 always look behind my back, look for the next thing</p> <p>18 that's going to happen.</p> <p>19 Q. Did you at some point believe that you</p> <p>20 were a spy working for some government?</p> <p>21 A. No.</p>
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<p>1 A. No.</p> <p>2 MR. STEINER: Objection.</p> <p>3 BY MR. HILL:</p> <p>4 Q. You think every fight you've been in was</p> <p>5 started by someone else?</p> <p>6 A. Yes.</p> <p>7 Q. Do you ever recall believing that you were</p> <p>8 a spy?</p> <p>9 A. Yes.</p> <p>10 Q. When was that?</p> <p>11 A. Two and a half years ago, two years ago.</p> <p>12 Q. Tell me what you thought in that regard.</p> <p>13 A. I was watching a series of spies and I</p> <p>14 believed that I always have to look behind me, look</p> <p>15 where -- I acted like I was always looking behind</p> <p>16 me, sitting in the restaurants, sitting faced</p> <p>17 towards the exit.</p> <p>18 I was looking for the exit to get out,</p> <p>19 looking for people who were going to attack me,</p> <p>20 looking for anything basically.</p> <p>21 Q. The reason you believe people were going</p>	<p>1 Q. Have you ever put out cigarettes on your</p> <p>2 own body?</p> <p>3 A. Yes.</p> <p>4 Q. On how many occasions have you done that?</p> <p>5 A. Twice.</p> <p>6 Q. When did you do that?</p> <p>7 A. When I was 17, 18.</p> <p>8 Q. Why did you do that?</p> <p>9 A. Because I was angry.</p> <p>10 Q. Who were you angry with?</p> <p>11 A. A girlfriend.</p> <p>12 Q. Same girlfriend both times?</p> <p>13 A. Yes.</p> <p>14 Q. Have you done anything else to harm</p> <p>15 yourself since the attack?</p> <p>16 A. No.</p> <p>17 MR. STEINER: Objection.</p> <p>18 BY MR. HILL:</p> <p>19 Q. You are wearing an earring today. Do you</p> <p>20 have any other body piercings?</p> <p>21 A. I had.</p>

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1 Q. How many times did you have body
2 piercings?

3 A. I had --

4 MR. STEINER: Objection.

5 THE WITNESS: I had a total of 17
6 piercings. Two of them I did to myself.

7 A few of them I did over again, over
8 and over again.

9 BY MR. HILL:

10 Q. Why did you get those body piercings?

11 MR. STEINER: Objection.

12 THE WITNESS: Because I was addicted
13 to pain.

14 BY MR. HILL:

15 Q. You did that because you wanted to feel
16 pain?

17 A. Yes.

18 Q. Is that why you put the cigarettes out on
19 yourself?

20 A. Yes.

21 Q. Did you ever come to the United States

1 Q. Was this before the trip to France or
2 after?

3 A. After.

4 Q. Did anyone from your family come with you
5 on this trip to the United States?

6 A. Yes.

7 Q. Who?

8 A. My mother.

9 Q. Anyone else from your family on that trip?

10 A. I don't think so.

11 Q. Who paid for that trip to the
12 United States?

13 A. I don't know.

14 Q. Have you ever told anyone that it was on
15 that trip that you first began to use marijuana?

16 A. Right after that.

17 Q. It was after that trip?

18 A. Right after that trip.

19 Q. So you went on that trip and then you
20 returned to Israel and that's when you began using
21 marijuana?

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1 with other terror victims?

2 A. Yes.

3 Q. When was that?

4 A. I don't remember when. It was California,
5 we were in Washington.

6 Q. Approximately how old were you when you
7 came to California and Washington?

8 A. Probably 17.

9 Q. Were you in Washington, D.C. or were you
10 in Washington state on the west coast?

11 A. I don't remember.

12 Q. But you visited both California and
13 Washington on the same trip?

14 A. And New York, yes.

15 Q. What other places in the U.S. did you
16 visit on that trip?

17 A. That's what I remember.

18 Q. Washington, New York, and California?

19 A. Yes.

20 Q. Which cities in California did you visit?

21 A. LA.

1 A. Yes.

2 Q. Did something happen on that trip that
3 caused you to start using marijuana?

4 MR. STEINER: Objection.

5 THE WITNESS: A girl.

6 BY MR. HILL:

7 Q. What was the girl's name?

8 A. Atara.

9 Q. You met Atara on this trip?

10 A. Yes.

11 Q. How did meeting Atara cause you to use
12 marijuana?

13 A. We became boyfriend and girlfriend. She
14 was using and she showed me that world.

15 Q. So you continued to see her for a period
16 of time after you went back to Israel?

17 A. Yes.

18 Q. She was the one that introduced you to
19 using marijuana?

20 A. Yes.

21 MR. STEINER: Objection.

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1 BY MR. HILL:

2 Q. Was she the same girlfriend that caused
3 you to burn yourself with cigarettes?

4 A. No.

5 Q. That was a later girlfriend?

6 A. Later girlfriend.

7 Q. Did you ever tell anyone that you used
8 MDMA and acid twice a week for two years?9 A. Not for two years, no. I used four times
10 MDMA and two times LSD two to three weeks.11 Q. So there was a period of time over the
12 course of two to three weeks when you were using
13 both acid and MDMA repeatedly, right?

14 A. LSD.

15 Q. There was a period of time over a two to
16 three week period where you were using both MDMA and
17 LSD repeatedly in that same time period, right?

18 A. Yes.

19 Q. When was that, approximately?

20 A. Two and a half, three years ago.

21 Q. Was that right before you began to get the

1 A. Yes.

2 Q. Has anyone ever told you whether you have
3 suffered brain damage as a result of your drug use?

4 MR. STEINER: Objection.

5 THE WITNESS: No.

6 BY MR. HILL:

7 Q. Did you ever tell anyone that you usually
8 left a job because of a dispute over money?

9 A. Yes.

10 Q. Who did you tell that to?

11 A. I don't remember.

12 Q. Is that true?

13 A. Yes.

14 Q. Many of the jobs you've ended because you
15 would have a disagreement with your employer about
16 money?

17 A. Yes.

18 Q. Did you ever tell anyone that these
19 disagreements sometimes became verbally and even
20 physically violent?

21 A. Only once.

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1 psychological treatment at that time you are
2 currently using?

3 MR. STEINER: Objection.

4 THE WITNESS: More intense.

5 BY MR. HILL:

6 Q. So you were already seeing Eyal at the
7 time of that particular episode?

8 A. No.

9 Q. It was after you had that heavy usage of
10 LSD and MDMA that you began to see Eyal?11 MR. STEINER: Objection to the
12 categorization.

13 THE WITNESS: Yes.

14 BY MR. HILL:

15 Q. Have you used either LSD or MDMA since
16 that episode?

17 A. Yes.

18 MR. STEINER: Objection.

19 BY MR. HILL:

20 Q. You just haven't used it that frequently
21 in that short of a timeframe, right?1 Q. On what occasion did you have a verbal or
2 physical disagreement with an employer?

3 A. It happened only once.

4 Q. When was that?

5 A. A year ago, year and a half ago.

6 Q. What employer did you have that verbal or
7 physical disagreement with?

8 A. Working in a coffee shop in Tel Aviv.

9 Q. What happened?

10 A. He owed me --

11 MR. STEINER: Objection.

12 THE WITNESS: He owed me something
13 like 600 shekels that he didn't want to pay me so I
14 stood on my -- what I deserved to get.

15 BY MR. HILL:

16 Q. You insisted on getting the money?

17 A. Yes.

18 MR. STEINER: Objection.

19 BY MR. HILL:

20 Q. You exchanged words?

21 A. Yes.

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<p>1 Q. Did you exchange blows?</p> <p>2 A. No.</p> <p>3 Q. Have you ever been in a physical</p> <p>4 altercation with an employer?</p> <p>5 A. No.</p> <p>6 Q. Ever been in a physical altercation with</p> <p>7 anyone at work?</p> <p>8 A. No.</p> <p>9 MR. STEINER: Would you mind if I</p> <p>10 stopped for two minutes?</p> <p>11 MR. HILL: If you need to take a</p> <p>12 break.</p> <p>13 MR. STEINER: Okay.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Has anyone ever recommended that you take</p> <p>16 medication to alleviate your diarrhea?</p> <p>17 A. No.</p> <p>18 MR. STEINER: Objection.</p> <p>19 BY MR. HILL:</p> <p>20 Q. You, in fact, have not taken any</p> <p>21 medication to attempt to alleviate that condition,</p>	<p>1 A. No, I don't think so.</p> <p>2 Q. Did it have an organization that sponsored</p> <p>3 it?</p> <p>4 A. From what I remember, it wasn't an</p> <p>5 organization. It was a family.</p> <p>6 Q. Approximately how many people were on that</p> <p>7 trip with you?</p> <p>8 A. 20.</p> <p>9 Q. You believe that the expenses for that</p> <p>10 were paid by a family that arranged for it?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know the family's name?</p> <p>13 A. No.</p> <p>14 Q. Was anyone else who was injured in the</p> <p>15 same event as you present on that trip to the</p> <p>16 United States?</p> <p>17 A. No.</p> <p>18 Q. Did you or your mother give any public</p> <p>19 speeches on that trip to the United States?</p> <p>20 A. I don't think so, no.</p> <p>21 Q. What did your mom do on this trip to</p>
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<p>1 right?</p> <p>2 A. Not that I know.</p> <p>3 Q. Do you remember being examined in</p> <p>4 connection with that condition at someplace called</p> <p>5 Maccabee Health Services?</p> <p>6 A. I don't know what it's called but I got it</p> <p>7 checked out.</p> <p>8 Q. That was last year, right?</p> <p>9 A. Yes.</p> <p>10 Q. But you don't remember the doctor</p> <p>11 recommending medication to you?</p> <p>12 A. He died.</p> <p>13 Q. The doctor died?</p> <p>14 A. Two weeks after.</p> <p>15 Q. What doctor was that?</p> <p>16 A. I don't know.</p> <p>17 Q. The doctor --</p> <p>18 A. I don't remember his name. I went to two</p> <p>19 doctors. One died, then I went to a different one.</p> <p>20 Q. Was the trip to the United States paid for</p> <p>21 by One Family?</p>	<p>1 California, Washington, and New York?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: She came with me.</p> <p>4 BY MR. HILL:</p> <p>5 Q. Was the purpose of this trip similar to</p> <p>6 the other ones you described where it was sort of a</p> <p>7 vacation and having fun?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: Similar.</p> <p>10 MR. HILL: Thank you.</p> <p>11 I don't have any questions for, further</p> <p>12 questions for you at this time subject to our</p> <p>13 outstanding request for additional documents.</p> <p>14 MR. STEINER: I have one question.</p> <p>15 We reserve our right to review and sign the</p> <p>16 transcript.</p> <p>17 CROSS EXAMINATION:</p> <p>18 BY MR. STEINER:</p> <p>19 Q. Leor, Mr. Hill, the lawyer for the PLO and</p> <p>20 the Palestinian Authority, asked you a question and</p> <p>21 you answered that question something like this case</p>

<p style="text-align: right;">Page 170</p> <p>1 is about the injuries, physical and psychological, I 2 received and what happened to me because my sister 3 and my best friend died. 4 Do you remember being asked that question 5 and giving an answer like that? 6 A. Yes. 7 Q. Can you explain to me what effect on you 8 the death of Rachel has caused, how you feel about 9 that today? 10 A. Of course. In the beginning it didn't 11 bother me. We weren't good friends. We didn't like 12 each other. 13 With time, growing up without a sister 14 became a big issue, very sensitive for me. 15 I do miss her. I want her to be here. It's 16 a big shame that she is not here. 17 Mentally it did a lot of, lot of, lot of 18 issues basically, makes me regret all the stuff I 19 said about her, all the stuff I did to her. 20 Mentally it changed everything. 21 MR. STEINER: Thank you.</p>	<p style="text-align: right;">Page 172</p> <p>1 sister. 2 Q. You mentioned that you had told your 3 mother that you felt like she cared more about her 4 dead daughter than her living sons, is that right? 5 A. Yes. 6 Q. When did you say that to her? 7 A. Plenty of times. 8 Q. At the time you said that did you believe 9 it to be true? 10 A. Yes. 11 MR. HILL: I don't have any further 12 questions. 13 MR. STEINER: Nothing else. 14 (Deposition adjourned at 11:39 a.m.) 15 16 17 18 19 20 21</p>
<p style="text-align: right;">Page 171</p> <p>1 RE-DIRECT EXAMINATION: 2 BY MR. HILL: 3 Q. You mentioned that you had regrets about 4 stuff you said to Rachel. 5 What is it you are thinking of that you 6 regret saying to her now? 7 A. Cursing her, also after the attack, it 8 didn't bother me that she died, giving pain to my 9 mother, telling her all kind of stuff like she cares 10 more about her dead daughter than her living sons, 11 stuff I said that hurt my mother mostly. I miss my 12 sister at the end of everything. 13 Q. Anything else that you are thinking of 14 that you said that you regret saying in connection 15 with Rachel other than what you just told me? 16 A. A lot of stuff but nothing that pops to my 17 mind right now. 18 Q. You said you also regret stuff you did 19 relating to Rachel. What do you mean by that? 20 A. Hitting her, fighting with her, not 21 getting along together, being a nasty teenager to my</p>	<p style="text-align: right;">Page 173</p> <p>1 Reporter's Certificate 2 3 I, the undersigned, Certified Court Reporter, 4 do hereby certify that the foregoing transcript of 5 testimony was taken by me in stenotype and 6 thereafter reduced to print under my direction, 7 that said transcript is a full, true and 8 substantially accurate record of the proceedings, 9 to the best of my ability. 10 I do further certify that I am neither counsel 11 for, related to, nor employed by any of the parties 12 to the action in which this deposition was taken; 13 and, further, that I am not a relative or employee 14 of any attorney or counsel employed by the parties 15 hereto, nor financially or otherwise interested 16 in the outcome of the action. 17 18 /s/ Michael Feuer 19 20 Certified Realtime Reporter 21</p>

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1 Certificate of Deponent

2 I hereby certify that I have read and
3 examined the foregoing transcript, and the same
4 is a true and accurate record of the testimony
5 given by me.

6 Any additions or corrections that I feel
7 are necessary I will attach on a separate sheet
8 of paper to the original transcript.

9

10

Signature of witness

12 I hereby certify that the individual
13 representing him/herself to be the above named
14 individual, appeared before me this _____
15 day of _____ and executed the above
16 certificate in my presence.

17

18

19

20

21

Notary Public

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1

2 Errata Page of Deponent

3 Please note any errors on this sheet. The
4 reasons may be general, such as "to correct
5 stenographic error" or "to clarify the record."
6 When completed, send this page to the attorney
7 who took your deposition, NOT the court reporter.

8 Page Line Correction Reason For Change

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